DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

INSPECTION REPORT

THE O'BRIEN CORPORATION
450 EAST GRAND AVE.
SOUTH SAN FRANCISCO,
CALIFORNIA 94080

EPA ID NO. CAD 005 130 455

Inspected By: Richard Wheeler, Associate Hazardous Materials Specialist

Date of Inspection: September 26, 1989
Date of Report: oct. 17, 1989

I. Purpose:

Major, Interim Status, TSD Facility Inspection, Land Ban Inspection and Hazardous Waste Generator Inspection.

II. Representatives Present:

The O'Brien Corporation:
Don L. Mazzaone, Director of Manufacturing
DHS/TSCP:
Richard Wheeler, Assoc. Hazardous Materials Specialist

III. Owner/Operator:

The O'Brien Corporation is an Indiana Corporation. The personnel directly responsible for hazardous waste management at this facility are: Don L. Mazzone, Director of Manufacturing and Michael Burdine, Manager of Engineering.

IV. Background:

According to the Toxic Substances Control Program (TSCP) files, the O'Brien Corporation (O'Brien) submitted a part A on November 14, 1980 and was issued an Interim Status Document on December 11, 1981 for storage in drums and tanks and treatment in tanks and in surface impoundments.

An Interim Status Document (ISD) inspection was conducted by the Department of Health Services (DHS) on April 26, 1982. A Notice Of Violation covering violations observed during this inspection was issued on September 28, 1982 noting incomplete or incorrect entries on manifests and a leaking drum. The ISD inspection performed by DHS on February 17, 1983 revealed several violations. A Notice of Violation

covering these items was issued on June 13, 1983. On June 25, 1985 an ISD inspection conducted by DHS revealed that most of the violations observed during the February 17, 1983 DHS - ISD inspection were corrected. A Notice of Violations was issued on November 12, 1985 outlining the violations observed during the June 25, 1985 DHS inspection. A U.S. EPA Region IX (EPA) Oversight Inspection was performed on December 18, 1985. DHS issued a Notice of Violations denoting the violations observed during the December 18, 1985 EPA inspection and carry-over violations inadequately corrected in submittals received as the result of the November 12, 1985 Notice of Violation stemming from the June 25, 1985 DHS - ISD inspection. On May 28, 1986 DHS conducted an ISD inspection. A Notice of Violations based on this inspection was issued on June 27, 1986.

A referral package combining violations noted by DHS and the San Francisco Regional Water Quality Control Board (SFRWQCB) (from a May 1986 ISD groundwater monitoring inspection) was forwarded to the State of California Attorney General's Office on August 14, 1986 for enforcement action. O'Brien and DHS signed a Stipulated Order and Schedule of Compliance on March 11, 1987 as a result of intervention by the Attorney General which required that O'Brien submit closure and post closure plans for DHS's approval, to install a groundwater monitoring system in compliance with ISD specifications, and to comply with all groundwater monitoring requirements.

An ISD Inspection was conducted on March 19, 1987 by Patti Barni and on April 12, 13, & 14, 1988 Edgar Refsell conducted an ISD Inspection in conjunction with a Comprehensive Groundwater Monitoring Evaluation Inspection (CME) conducted by the San Francisco Bay Regional Water Quality Control Board.

The 1987 inspection showed two Class II container storage violations. The 1988 inspection revealed two violations of their waste analysis plan and one violation of their emergency preparedness plan.

Separate Reports of Violation (ROV) dated April 17, 1987 and September 16, 1988 were issued to O'Brien. A letter of compliance sent on May 2nd, 1989 showed that O'Brien had satisfactorily completed the required corrections for both of these ROV's and stated the corporation had achieved compliance.

O'Brien has a permit to discharge nonhazardous rainwater to the South San Francisco City Sanitary Sewer System (SSFCSSS).

V. General Description of Facility:

O'Brien manufactures and blends paints and coatings and is located on a 26-acre site at the east end of Grand Avenue in South San Francisco. It is bounded on the north side by Merck Co., a chemical manufacturing firm, the San Francisco Bay on the east side, filled land, zoned industrial on the south side and commercial distributing companies on the west side. Paints and coatings have been manufactured at this plant since 1892. The O'Brien Corporation, successor to Fuller-O'Brien Company has owned and operated this paint plant since 1967.

Current waste units status is as follows:

Surface Impoundments (Taken out of service in 1981):

1. The three sludge impoundments have been emptied, the sludge and soils contaminated with heavy metals such as lead have been removed. These impoundments were temporarily backfilled in 1985 with the approval of DHS, SFRWQCB, and EPA. Final closure is pending the review and approval of the firms' previously submitted and revised closure plan by DHS, SFRWQCB and EPA.

   The original capacity of these evaporation ponds was 72,000 gallons of neutralized, filtered latex waste washwater. Approximately 400 tons per year of such wastewater was formerly processed in this manner. A groundwater monitoring system consisting of 13 wells was installed in 1983, 1984, and 1985 with nine new wells installed in 1987 as per the requirements of the Stipulated Order and Schedule of Compliance signed on March 11, 1987. Quarterly analytical results have been sent to the SFRWQCB, EPA and DHS. These results are still under review as part of the CME Inspection.

2. Tanks (Taken out of service in 1987):

   The two metal tanks, one 10,000 gallon and one 20,000 gallon used to neutralize latex paint waste washwater and precipitation solids along with their concrete slab foundations, have been emptied, taken out of service, decontaminated and removed in 1987 with prior approval by EPA, SFRWQCB and DHS.

3. Container Storage (Last use was March 28, 1989):

   The container storage area has been used in the past to store five types of waste streams:

a. Filter paper containing resins and a small amount of solvents (mostly mineral spirits) from the hot pressure filtering of resins manufactured on-site for use in paints and resin coatings. The resin manufacturing plant has been removed and the building demolished. At present there is no waste stream from resin manufacturing.

b. Paper pigment bags containing lead, barium and chromium pigment residues from paint manufacturing were containerized and stored here. O'Brien no longer uses these metals for pigments. At present there's no waste stream from metal pigments.

c. Latex Paint Waste Water Sludges: These wastes are now collected in empty tanks and are recycled as raw ingredients for specialized paints. At present there is no accumulation of Latex Paint Waste Water Sludges and no waste stream from this process.

d. Wash Thinner (Waste Solvent): Solvents are employed to clean tanks and equipment used to manufacture paints. When this solvent is spent, the waste solvent (Wash thinner) is sent off-site in bulk shipments by a certified hauler in tanker trucks for recycling by permitted recyclers. At present there is no accumulations on site of this waste stream.

e. Empty Acrylonitrile Drums: In the past, these drums were crushed on-site and shipped off-site as extremely hazardous waste. These drums are now returned to the manufacturer and recycled for packaging the same material. There is no waste stream from empty drums at present.

4. Main Rainwater Sump:

This sump receives rainwater from the entire process area of the plant via eight sumps and may contain hazardous wastes from spills such as heavy metals, oils and solvents which may have occurred from paint production, finished products storage and/or the raw ingredient storage areas.

The rainwater collected in this sump is described as "unknown wastes" in the waste analysis plan.

VI. Hazardous Waste Activity Description:

1. The Container Storage Area.

The container storage area is no longer used for storage. Hazardous waste generated by maintenance activities or other infrequent occasions are containerized and shipped within the 90 day requirement.

2. Recycling.

a. Solvents are used to clean equipment employed in the manufacture of solvent/oil based paints. When this solvent/paint oil mixture is no longer useful in cleaning this equipment, it is picked up by Romic Chemical in a tank truck at the volume of 5,000 gallons per month for recycling by Romic Chemical. The solvents and paint oils are separated in the recycling process and are sold separately as recycled products.

b. Latex waste washwater is now retained in tanks and reused in paint manufacturing. Approximately 100,000 gallons (400 tons) per year is recycled.

c. Empty acrylonitrile drums are returned to the manufacturer as are other empty drums for reuse by the manufacturer as recycled packaging.

3. Main Rainwater Sump.

This sump receives rainwater from eight other sumps which drain the entire site. Prior to discharge to the SSFCSSS the firm samples this rainwater to determine whether or not this water is hazardous as the result of inadvertent spills from paint manufacturing and the storage of raw ingredients. The water could contain heavy metals, oils and solvents such as toluene, mineral spirits, methyl ethyl ketone, acetone and xylene. The samples are analyzed by a DHS certified laboratory and if analytical results indicate that the water is hazardous, i.e., above the firms' discharge requirements as set out in their permit issued by the SSFCSSS for discharge, then the water is disposed of as a hazardous waste. Discharge requirements as set out in O'Brien permit issued by SSFCSSS for wastewater discharges are below the hazardous waste criteria as established in Title 22, California Code of Regulations requirements set by DHS.

VII. Violations:

No violations were observed.

VIII. Observations:

1. I toured the entire paint plant and observed the plant to be a clean operation within the parameters of an operation of this type.

2. The three surface impoundments were filled with soil and are now covered with an abundant growth of vegetation (see photos #1 & 2).

3. The two latex waste treatment and storage tanks and supporting concrete foundation were removed. The area was leveled and it also is covered with an abundant growth of vegetation (see photo #1).

IX. Discussion with Management:

The current status of the corporation's ISD at the South San Francisco facility was discussed.

The closure status of O'Brien's ISD has yet to be determined as "Clean Closure" is pending approval of the closure activities required by EPA and a post-closure permit to be issued by EPA.

These activities are described in the CME Work Plan and the "Road Map Report" as discussed by Chris Prokop, Geologist in his letter to O'Brien on June 14, 1989 (Attachment # 7).

X. Attachments:

1. CEI Checklist - 26 pgs.
2. Generator CEI Checklist - 14 pgs.
3. Land Ban Generator Checklist - 19 pgs.
4. Wash Thinner Analysis - 1 pg.
5. Wash Thinner Shipping Record - 1 pg.
6. Photographs - 3 pgs.
7. June 14, 1989 Letter from EPA to O'Brien - 9 pgs.
8. Financial Liability Review - 1 pg.

Richard A. Wheeler
Associate Hazardous Materials Specialist

10/17/89
Date Submitted

Denise Tsuji
Senior Hazardous Materials Specialist

10/17/89
Date Approved

DT:RW:om-27

871-6060
Don Mazzone

CEI Checklist

SITE ID#: C A D 0 0 5 1 3 0 4 5 5

INSPECTION DATE: 9/26/89

SITE NAME: The O'Brien Corporation

LOCATION: 450 E. Grand Ave.

South San Francisco (City) CA (State) 94080 (Zip)

LEAD INSPECTOR: Richard Wheeler

OFFICE: NCCR

INDEX FOR T/S/D'S CHECKLIST

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~~266: C1~~	~~RECYCLABLE MTLS/ Used as disposal~~
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~~E1~~	~~USED OIL " " " "~~
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~~G1~~	~~lead-acid BATTERY RECLAMATION~~
~~268: LAND DISPOSAL RESTRICTIONS~~	
~~280: UNDERGROUND PRODUCT STORAGE TANKS~~	

Also Completed:

Generator X Transporter ___

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY

Attachment #1

For inactive facilities (those no longer adding hazardous waste to treatment, storage, or disposa units but which have not certified clean closure in accordance with an approved closure plan)

Interim Status - Cont.
(Part 270 Subpart G)

	Yes	No	Comments
Termination of interim status:			
Did the facility submit a requested Part B in full, and on time? 270.10(e)(5), 270.73(b)	✓		
For land disposal facilities granted interim status prior to 11/8/84, did the facility submit before 11/8/85: 270.73(c)-			
(1) Part B of the permit application?			N/A ISD issued 12/11/81
(2) Certification of compliance with all applicable ground water monitoring and financial responsibility requirements?	✓		Compliance in progress Stipulated Judgement signed 6/5/87 requiring compliance.
For land disposal facilities granted interim status after 11/8/84, did the facility submit within 12 months: 270.73(d)-			
(1) Part B of the permit application?			N/A
(2) Certification of compliance with all GW monitoring and financial responsibility requirements?			
For incinerator facilities, did the facility submit a Part B before 11/8/86? 270.73(e)			
For all other facilities, was a Part B submitted before 11/8/88* ? 270.73(f)			

See also applicable interim-status requirements for surface impoundments (265.221(b), p. K1) and landfills (265.301(b), p. N1).

*If no, interim status will terminate on 11/8/92.

General Facility Standards:
(Part 265 Subpart B)

	Yes	No	Comments
Required Notices:			
Has the RA been notified at least 4 weeks prior to the receipt of H.W. from a foreign source? 265.12(a) (see also Generators, 262 Subpart F.)	—	—	N/A Not receiving
Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)	—	—	N/A No sale or transfer
General Waste Analysis:			
Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each H.W.? 265.13(a)(1)	✓	—	
Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a)(2)	✓	—	
Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a)(3)	✓	—	
Is the analysis repeated when there is a change in the generating process? (265.13(a)(3)(i)	✓	—	
For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest? 265.13(a)(3)(ii)	—	—	N/A No off-site facilities
For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest? 265.13(a)(4)	—	—	↓

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
Unless exempt under 265.14(a)(physical contact or disturbance of the waste and unit will not cause harm), do security measures include:			
A 24-hour surveillance system? 265.14(b)(1) or:	✓		
Artificial or natural barriers that complete enclose the facility? 265.14(b)(2)(i) and:	✓		
Means to control entry onto the active portions of the facility at all times? 265.14(b)(2)(ii)	✓		
Are signs with the legend "Danger-Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)			
At each entrance and any other approach to active portions of facility?	✓		
Legible from at least 25 feet away?	✓		
Written in English and any other language predominant in the surrounding area?	✓		Spanish
General Inspection Requirements:			
Does the facility inspect for malfunctions, deterioration, operator errors, and H.W. discharges often enough to correct problems before they cause harm? 265.15(a)	✓		
Does the facility follow a written inspection schedule? 265.15(b)(1)	✓		
Is the schedule kept at this facility? 265.15(b)(2)	✓		
Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b)(3)			
monitoring equipment?	✓		
safety, emergency equipment?	✓		
security devices?	✓		
operating and structural equipment?	✓		

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
Do new personnel complete the training within 6 months? 265.16(b)	✓		
Do personnel take part in an annual review of the initial training? 265.16(c)	✓		
Do personnel training records include for each H.W. position: 265.16(d)-			
(1) Job title and name of person filling the position?	✓		
(2) Job Description?	✓		
(3) Description of required H.W. training?	✓		
(4) Documentation that H.W. training or job experience required has been completed?	✓		
Are training records kept for current employees until closure, and past employees for at least three years? 265.16(e)	✓		
Requirements for ignitable, reactive, or incompatible wastes:			
Are precautions taken to prevent accidental ignition or reaction, including: 265.17(a)			
Separation and protection from ignition sources?	✓		
No smoking signs in hazard areas?	✓		
Is the T/S/D of ignitable, reactive or incompatible waste conducted so that it does not: 265.17(b)-			
(1) Generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
(2-3) Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	✓		
(4) Damage structural integrity of H.W. containment devices?	✓		
(5) Otherwise threaten human health or the environment?	✓		

Preparedness and Prevention: - Continued
(Part 265 Subpart C)

	Yes	No	Comments
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements:			
Arrangements to familiarize police, fire dept., and emergency response teams with H.W. operations? 265.37(a)(1)	✓	—	
Agreements designating primary emergency authority? 265.37(a)(2)	✓	—	
Agreements with State emergency response teams, contractors and equipment suppliers? 265.37(a)(3)	✓	—	
Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W.? 265.37(a)(4)	✓	—	
Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements? 265.37(b)	—	—	N/A No refusals

Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
(d) The list of emergency coordinators changes?	✓		
(e) The list of emergency equipment changes?	✓		
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	✓		
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	✓		
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	✓		
If an emergency situation has occurred at this facility, did the emergency coordinator immediately:			
Activate alarm systems? 265.56(a)(1)			N/A No such emergency situation
Notify the appropriate response agencies? 265.56(a)(2)			
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)			
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)			
If assessment indicates the release could threaten harm outside the facility, does the E.C.:			
Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)			N/A No such assessment

Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
If the contingency plan has been implemented:			
Did the operating record include the date, time, and any details of each incident that required implementation of the contingency plan? 265.56(j)	___	___	N/A Not implemented
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	___	___	
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	___	___	
(2) Name, address, and phone # of the facility?	___	___	
(3) Date, time, and type of incident?	___	___	
(4) Name and quantity of materials involved?	___	___	
(5) The extent of any injuries?	___	___	
(6) A hazard assessment?	___	___	
(7) An estimate of the quantity and disposition of recovered material?	___	___	

Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	Yes	No	Comments
Operating Record:			
Does the facility maintain an operating record? 265.73(a)	✓		
Does the operating record contain the following information:			
A description and the quantity of each waste received as required by Appendix I? 265.73(b)(1)			N/A
The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I? 265.73(b)(1)	✓		
The location of each waste within the facility and the quantity at each location? 265.73(b)(2)	✓		
For disposal facilities, the location and quantity of each waste recorded on a map or diagram of each cell or disposal area? 265.73(b)(2)			N/A No disposal
For all facilities, is the location and quantity information cross-referenced to specific manifest numbers? 265.73(b)(2)			N/A
Records and results of all waste analysis and trial tests? 265.73(b)(3)	✓		
Reports detailing all incidents that required implementation of the contingency plan? 265.73(b)(4)			N/A
Records and results of inspections for the last three years? 265.73(b)(5)	✓		
Monitoring, testing, and analytical data? 265.73(b)(6)	✓		
All closure and post-closure costs as applicable? 265.73(b)(7)	✓		
Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units when granted a Part 268 case-by-case extension, monitoring data required by a successful petition, certifications under 268.8 (1st 3rd soft hammer), and all applicable generator notices? 265.73(b)(8)			N/A

Manifest System, Recordkeeping, and Reporting: - Con't.
(Part 265 Subpart E)

	Yes	No	Comments
Biennial Report:			
Has the facility submitted a biennial report to the RA by March 1 of each even numbered year? 263.75 66493, C7165	✓	—	
Was the report submitted on EPA form 8700-13B and did it cover facility activities during the previous calendar year? 265.75	—	—	N/A Submitted on DHS Form 8303 (1/89)
Does the report include the following information: 265.75-			
(a) EPA identification number, name and address of the facility?	✓	—	
(b) Calendar year covered by report?	✓	—	
(c) For off-site facilities, the EPA ID number of each HW generator?	—	—	N/A No off-site facilities
(d) A description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?	—	—	N/A No receiving
(e) Methods of treatment, storage, or disposal for each H.W.?	—	—	Not asked for in form
(f) Ground-water monitoring data under 265.94(a)(2)(ii-iii) and (b)(2)?	—	—	↓
(g) Most recent closure and post-closure cost estimates? $75,000 $40,000	✓	—	
(h) Signed certification?	✓	—	

Ground-Water Monitoring:
(Part 265 Subpart F)

	Yes	No	Comments
If the facility operates a HW surface impoundment, landfill, or land treatment unit*, has a ground-water monitoring program consisting of at least one up-gradient and three down-gradient wells been implemented (and certified under 270.73)? 265.90(a)	✓	—	
If no, is a written waiver demonstration, certified by a qualified geologist or geotechnical engineer, kept at the site? 265.90(c)	—	—	N/A
Date of last CME or O&M: 4/14/88			EPA? ✓ State? ✓
Is a ground-water sampling and analysis plan kept at the facility? 265.92(a)	✓	—	
Does it include procedures and techniques for: 265.92(a)-			
(1) Sample collection?	✓	—	
(2) Sample preservation and shipment?	✓	—	
(3) Analytical procedures?	✓	—	
(4) Chain of custody control?	✓	—	
Has an outline of a ground-water quality assessment program been prepared? 265.93(a)	✓	—	
Have records been kept of: 265.94(a)(1)			
Analysis for all parameters (see next page) quarterly for the first year as required by 265.92(c)?	✓	—	
Ground-water quality analysis annually since the first year as required by 265.92(d)(1)?	✓	—	
Ground-water contamination indicators at least semi-annually since the first year as required by 265.92(d)(2)?	✓	—	
Ground-water surface elevations taken during each sampling of each well as required by 265.92(e)?	✓	—	
The Student's t-test calculations (at the 0.01 level of significance) for comparison of ground-water contamination indicators over initial background as required in 265.93(b)?	✓	—	

* Including units that are inactive but not certified as clean closed.

Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
Reporting by facilities that may be affecting ground-water quality: 265.77(b), 265.93(d)			
If the facility confirmed the determination they may be affecting ground-water quality was not made in error (265.93(c)(2)), was a written notice sent to the RA within 7 days of confirmation? 265.93(d)(1)	___	___	N/A See Stipulated Judgement
Within 15 days of notification to the RA was a certified ground-water quality assessment plan submitted? 265.93(d)(2)	___	___	
After implementation of this plan, did the facility determine if H.W. or H.W. constituents from the facility have entered the ground-water? 265.93(d)(4)	___	___	
Within 15 days after the determination was a written report containing the assessment of ground-water quality submitted to the RA? 265.93(d)(5)	___	___	
If no H.W. or H.W. constituents were shown to have entered the ground water, was the RA informed in the determination if the indicator evaluation program only (defined in 265.92 and 265.93(b)) was reinstated? 265.93(d)(6)	___	___	
If H.W. or H.W. constituents have been determined to have entered the ground water, are determinations of H.W or H.W. constituents continued on a quarterly basis until final closure of the facility*? 265.93(d)(7)	___	___	

* If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination per 265.93(d)(7)(ii).)

-Closure and Post-Closure:
(Part 265 Subpart G)

	Yes	No	Comments
Does the facility have a closure plan? 265.112(a)	✓		Date: May 1987
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.112(a)	✓		
Does the plan identify for the active life of the facility:			
The steps necessary to completely or partially close the facility at any point? 265.112(b)			N/A Closure Plan for the 2 tanks and 3 surface impoundments received, approved and certified as per stipulated judgement
How each Hazardous Waste management unit will be closed? 265.112(b)(1)			
How final closure standards (265.111) will be met? 265.112(b)(2)			
The maximum extent of the operation which will be unclosed? 265.112(b)(2)			
An estimate of the maximum inventory of HW ever on-site? 265.112(b)(3)			
A detailed description of the methods to be used during partial and final closure? including: 265.112(b)(3)			
Removing, transporting, treating, storing, and disposal of all HW?			
Identification of and types of off-site HW management units to be used?			
A detailed description of steps for removal or decontamination during partial and final closure? including: 265.112(b)(4)			
Contaminated containment system components, equipment, containers, structures, soils, and HW residues?			
Procedures for cleaning equipment and removing contaminated soils?			
Methods for sampling and testing surrounding soils?			
Testing criteria for determining adequacy of clean-up?			

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

Post-closure plan:	Yes	No	Comments
If the facility operates a hazardous waste disposal unit, do they have a post-closure plan? 265.118(a)	—	—	N/A Not a disposal facility
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.118(b)	✓	—	
If the facility was intending to clean-close a surface impoundment or waste pile and found they are required to close it as a landfill, did they submit a post-closure plan to the RA within 90 days? 265.118(a),(d)(3-4)	—	—	N/A Stipulated Judgement Finalized
Does the plan provide for 30 years of post-closure care (unless granted an exemption under 265.118(g))? 265.117(a)(1)	—	—	
Does the plan describe the monitoring activities and the frequency they will be performed to comply with each unit's regulatory requirements? 265.118(c)(1)	—	—	
Does the plan describe the maintenance activities and the frequency they will be performed to ensure: 265.118(c)(2)-			
(i) The integrity of the cap, final cover or other containment devices?	—	—	
(ii) The continued function of the monitoring devices?	—	—	
Does the plan identify the name, address and phone number of the post-closure period contact? 265.118(c)(3)	—	—	
Did the facility amend the plan whenever changes in operating plans, facility design, or events which occur during the active life of the facility affect their post-closure plan? 265.118(d)(1)	—	—	
Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days of any unexpected changes? 265.118(d)(2)	—	—	
Was the amended plan resubmitted to the EPA by this deadline? 265.118(d)(3)	—	—	

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
Closure Activities:			
Deadlines for submission of post-, partial-, and final closure plans:			
If the plans had not been approved, had the facility submitted the plan at least 180 days prior to the expected closure of the first surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d), -118(e)	—	—	N/A
Had a closure plan been submitted 45 days prior to the expected closure of a facility with only tanks, container storage, or incinerator units? 265.112(d)	—	—	
If the closure plan had already been approved, was it resubmitted 60 days prior to the expected closure of any surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d)	—	—	
Was the "expected closure" date within:			
30 days after a H.W. unit received its known final volume of HW? 265.112(d)(2), -.118(e) or:	—	—	
If there was a reasonabe possibility the H.W. unit would receive additional waste, one year since it actually last received a volume of H.W. (unless granted an exemption)? 265.112(d)(2), -.118(e)	—	—	
Was the closure plan submitten within 15 days after termination of interim status for any reason other than being granted a final permit? 265.112(d)(3), -.118(e)(1)	—	—	
Facilities in the process of closure:			
Was all H.W. in the closing unit or facility treated, removed, or disposed of on-site, in accordance with the approved closure plan, within 90 days after receiving either the final volume of H.W or approval of the closure plan? 262.113(a) or:	—	—	
Did the RA approve a longer period? 262.113(a)(1-2)	—	—	

	Y	N	Comments
Within 60 days of certification of closure for the first H.W. disposal unit, and within 60 days of certification of the last H.W. disposal unit, has the owner/operator: 265.119(b)-			
(1) Placed a record in the deed that will in perpetuity notify any potential purchaser of the property that:			
(i) The land was used to manage H.W.?			N/A
(ii) Its use is restricted under Subpart G?			
(iii) The required survey plat (265.116) and disposal records (265.119(a)) have been filed?			
(2) Submitted to the RA a signed, certified copy of the notice and deed?			
Post-closure care:			
Has the specified post-closure contact kept the plan during the post-closure care period? 265.112(b)			
Are all post-closure care activities in the approved plan being performed? 265.117(c)			
Has the owner or operator, or any subsequent owner of the land, obtained an approved post-closure plan modification before tampering with the HW unit? 265.119(c)			
Completion of post-closure care:			
At the completion of post-closure care for each unit, did the facility certify to the RA within 60 days that the care was performed in accordance to the post-closure plan's specifications? 265.120			
Was the certification signed by an independent registered professional engineer? 265.120			

Financial Requirements:
(Part 265 Subpart H)

	Yes	No	Comments
the facility owned by the State or deral Government? 265.140(c) Yes, Subpart H is not applicable.		✓	
st estimate for closure:			
s a written estimate been prepared of e cost of closing the facility? 5.142(a).	✓		
at is the amount of the closure cost estimate? $ 75,000			
es the cost estimate cover all the tivities in the closure plan 5.142(a).	✓		
1) Does the estimate equal the cost of osure at the point when the extent d manner of the operation would make osure the most expensive?	✓		
2) Is the estimate based on the cost of ring a third party (not a subsidiary or rent corporation) to close the facility?	✓		
3) Has the estimate not incorporated any lvage values?	✓		
4) Was a zero cost not incoporated for zardous waste that might have economic lue?	✓		
s the cost estimate revised no later an 30 days after a change in the osure plan increased the cost of osure? 265.142(c). evised estimate must be adjusted r inflation).			N/A
e the latest closure cost estimate d adjusted closure cost estimate kept the facility during its operating fe? 265.142(d).	✓		

Use And Management Of Containers:
(Part 265 Subpart I)

	Yes	No	Comments
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171	✓		Facility is presently not handling or storing H.W. containers
Are containers compatible with the H.W. stored in them? 265.172			N/A See above
Are containers stored closed? 265.173(a)			
Are containers managed to prevent rupture or leakage? 265.173(b)			
Are containers inspected weekly for leaks and deterioration? 265.174	✓		
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176			N/A
Are incompatible wastes stored in separate containers? 265.177(a)			
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)			
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)			
Are containers or inner liners that are not empty managed as H.W.? 261.7(a)(2)			
For a container to be considered empty the facility must ensure that no more remains than: 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:			
(ii) One inch of residue on bottom of container or inner lining? or:			

* TSDs that generate H.W. also must comply with 262 reg.s. An Accumulation Areas checklist is attached for field use at multiple-unit facilities.

Satellite

ACCUMULATION AREAS & CONTAINERS

Names of accumulation areas

No Such Area

Accumulation if Less than 55 gallons

The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:

The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)

AND

The containers are in good condition 265.171.

AND

The containers are compatible with the waste 265.172.

AND

The containers are stored closed 265.173(a).

AND

The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).

Accumulation if greater than 55 gallons

Are containers visibly marked with:

The date that the waste accumulation started? 262.34(a)(2)

The words "hazardous waste"? 262.34(a)(3)

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).

Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.

Does the facility have the following equipment where applicable: 265.32-

(a) Internal communications or alarm system capable of providing immediate emergency instruction?

(b) Telephone or 2-way radios at the scene of operation?

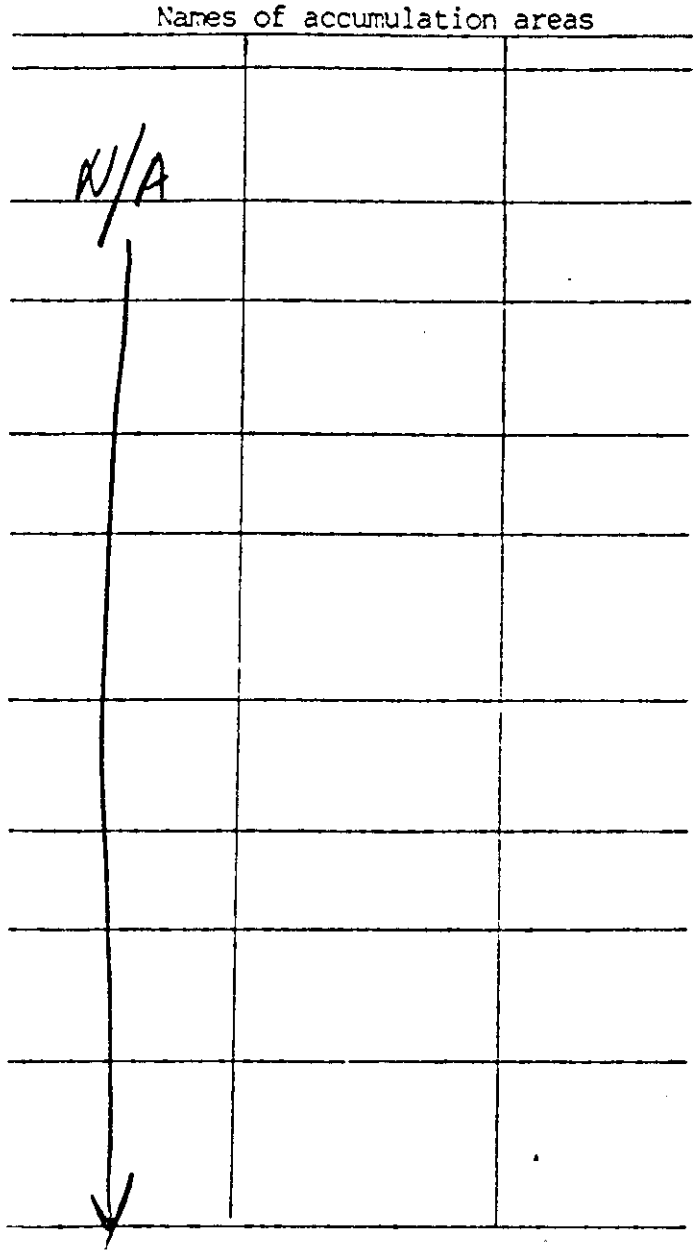
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?

(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?

Are the systems and equipment listed above tested? 265.33.

Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?

Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35.



Tanks:
(Part 265 Subpart J)

	Yes	No	Comments
Are tanks used to store or treat H.W. exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	___	___	N/A The two treatment tanks were decontaminated and removed
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	___	___	
See also Part 280, underground product tanks. If a 100-1000 kg/mo. generator, see Part 262 checklist.			
Is H.W. or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	___	___	
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings?	___	___	
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?	___	___	
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?	___	___	
Are daily inspections done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems?	___	___	
(2) Corrosion or releases of waste in aboveground portions?	___	___	
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells?	___	___	

Note: If the primary purpose of this inspection is to evaluate compliance with H.W. storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
H.W. with a substantially different process than was previously used, did the facility: 265.200-			
(a) Conduct waste analysis and trial treatment or storage tests (bench-tests)? or:	___	___	N/A
(b) Have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions?	___	___	
Construction, containment, and assessment:			
If the tank system or component used to treat H.W. was installed after 7/14/86, go to 265.192, new tank systems (next page).	___		
If an existing tank system (installation commenced or committed before 7/14/86) with a secondary H.W. containment system, go to 265.193 (page J6).	___		
If an existing tank system without complying secondary containment, has the facility determined whether the tank system is either not leaking or unfit for use? 265.191(a)	___	___	
If found to be leaking or unfit for use, has the facility complied with 265.196 (page J9)? 265.191(d)	___	___	
If fit for use, has the facility obtained a written assessment that attests to the tank system's integrity by 1/12/88*? 265.191(a)	___	___	
Was the assessment on file at the facility, and certified by an independent, registered professional engineer? 265.191(a)	___	___	
Did the assessment consider: 265.191(b)-			
(1) Original blueprints and standards?	___	___	
(2) H.W. characteristics?	___	___	
(3) Existing corrosion protection measures?	___	___	
(4) Documented age of tank, if known?	___	___	
(5) Leak test, internal inspection, or integrity test results?	___	___	

* Or within 12 months after their waste is listed as a H.W. 265.191(c)

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
New tank corrosion certification:			
Where the external shell of a metal tank or any metal component touches soil or water, was the tank design and installation supervised and certified by a corrosion expert? 265.192(a)(3)	___	___	N/A
Did the corrosion certifications consider these factors: 265.192(a)(3)(i)-			
(A) Soil moisture content?	___	___	
(B) Soil pH?	___	___	
(C) Soil sulfides level?	___	___	
(D) Soil resistivity?	___	___	
(E) Structure to soil potential?	___	___	
(F) Influence of nearby underground metal structures or piping?	___	___	
(G) Stray electric current?	___	___	
(H) Existing corrosion-protection measures (coating, cathodic protection, etc.)?	___	___	
Was at least one of the following used to ensure tank integrity? 265.192(a)(3)(ii)-			
(A) Corrosion-resistant construction materials such as special alloys, fiberglass-reinforced plastic, etc.?	___	___	
(B) Corrosion-resistant coatings such as epoxy or fiberglass?	___	___	
(C) Electrical isolation devices such as insulating joints, flanges, etc.?	___	___	

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Does the secondary containment for tanks include one of these devices? 265.193(d)-	___	___	N/A
(1) A liner external to the tank?	___		
(2) A vault?	___		
(3) A double-walled tank? or:	___		
(4) An equivalent approved by the RA?	___		
If an external liner is used, does it: 265.193(e)(1)-			
(i) Contain 100% of the largest tank?	___	___	
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	___	___	
(iii) Be free of cracks or gaps?	___	___	
(iv) Capable of preventing lateral and vertical migration of waste?	___	___	
If a vault system is used, does it: 265.193(e)(2)-			
(i) Contain 100% of the largest tank's volume?	___	___	
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	___	___	
(iii) Have any joints sealed?	___	___	
(iv) Have an impermeable liner or coating over the concrete?	___	___	
(v) Protect against vapor formation from ignitable or reactive wastes?	___	___	
(vi) Have an exterior moisture barrier to prevent seep-in?	___	___	
If a double-walled tank is used, is it: 265.193(e)(3)-			
(i) One integral structure?	___	___	
(ii) Protected from interior and exterior corrosion?	___	___	
(iii) Provided with a leak detection system capable of detecting a leak within 24 hours (if possible)?	___	___	

Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
Leaks, spills, unfit-for-use tanks:			
If a tank system or secondary containment system has had a leak or spill, or is unfit for use, was it immediately removed from service? 265.196	___	___	N/A
Did the facility immediately stop the flow of H.W. into the system, and inspect to determine the cause of the release? 265.196(a)	___	___	
If the release was from the tank system, within 24 hours of detection (if possible) did they remove enough waste to prevent further release and allow inspection and repair? 265.196(b)	___	___	
If the release was to a secondary containment system, were all released materials removed in 24 hours? 265.196(b)(2)	___	___	
If the release was to the environment, did the facility immediately conduct a visual inspection of the release? 265.196(c)- and:	___	___	
(1) Contain it to prevent further migration to soils or surface water?	___	___	
(2) Remove and properly dispose of any visible contamination of the soil or surface water?	___	___	
Was the leak or spill of H.W.: 265.196(d)(2)-			
(i) Less than or equal to one pound? and,	___	___	
(ii) Immediately contained and cleaned up?	___	___	
If not, was the spill or leak reported to the RA within 24 hours? 265.196(d)(1)	___	___	
If the reportable leak was a release to the environment, was a full report submitted to the RA within 30 days of detection? 265.196(d)(3)	___	___	
Did the environmental release report include: 265.196(d)(3)-			
(i) Likely route of migration?	___	___	
(ii) Characteristics of the surrounding soil composition, geology, hydrogeology, and climate?	___	___	
(iii) Results of any monitoring or sampling? (if not, were the results forwarded to the RA as soon as the analysis was received)?			

	Yes	No	Comments
Tank closure and post-closure care:			
At closure, did the facility remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), structures, soil, and equipment? 265.197(a)	___	___	N/A
If the facility demonstrated that all contaminated soils cannot be removed or decontaminated, did they close the tank and perform post-closure care as if a landfill? 265.197(b)	___	___	
If the facility has a tank system without complying secondary containment or an exemption, did they include contingent closure and post-closure plans covering the care and reporting provisions for landfills? 265.197(c)(1-2)	___	___	
Did they include the contingent plans in the cost estimate? 265.197(c)(3)	___	___	
Did they include the contingent plans' costs in the financial assurance and responsibility estimates? 265.197(c)(4-5)	___	___	

See also Subparts G, H.

Surface Impoundments:
(Part 265 Subpart K)

	Yes	No	Comments
Has the facility installed two or more liners and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received H.W. after 5/8/85? 265.221(a) or:	—	—	N/A The three surface impoundments have been emptied and backfilled.
Has the RA approved a waiver? 265.221(c-d)	—	—	
For existing interim status H.W. surface impoundments not covered above, did the facility retrofit the impoundment by 11/8/88? HSWA 3005(j)(1) or:	—	—	
Did the facility cease accepting H.W. by 11/8/88* and submit a closure plan? HSWA 3005(j)	—	—	
If the facility did install double liners and a leachate collection system, did the facility notify the RA at least 60 days prior to receiving waste in the impoundment? 265.221(b) and:	—	—	
Within six months of submitting this notice, file a Part B application? 265.221(b)	—	—	
Do impoundments have at least 2 feet of freeboard? 265.222(a) or:	—	—	
Does the facility have on site an engineer's certification stating what alternative design features prevent overtopping of the dike? 265.222(b)	—	—	
Is the freeboard level inspected at least daily? 265.226(a)	—	—	
Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity? 265.223	—	—	
Is the impoundment, including dikes and surrounding vegetation, inspected weekly to detect leaks, deterioration, or failure? 265.226(b)	—	—	

* The facility may continue to treat in surface impoundments waste in place before 11/8/88, and may place wastes removed for retrofitting or closure acitivites back into the same impoundment they were removed from.

Surface Impoundments: - Continued
(Part 265 Subpart K)

	Yes	No	Comments
At closure, has the facility removed or decontaminated, and managed as a H.W., all: 265.228(a)(1)			
Waste residues?	—	—	N/A
Containment system components?	—	—	
Contaminated subsoils?	—	—	
Structures and equipment contaminated with waste and leachate?	—	—	
Has the facility closed the impoundment and managed it like a landfill (under Subpart G and 265.310)? including: 265.228(a)(2)-	—	—	
(i) Eliminating free liquids by removing wastes or solidifying the remaining wastes and residues?	—	—	
(ii) Stabilized remaining wastes to a bearing capacity sufficient to support the final cover?	—	—	
Has the facility installed a final cover that: 265.228(a)(2)(iii)-			
(A) Provides long-term minimization of liquid migration?	—	—	
(B) Functions with minimum maintenance?	—	—	
(C) Promotes drainage and minimizes erosion or abrasion of the cover?	—	—	
(D) Accomodates settling and subsidence to maintain cover integrity?	—	—	
(E) Has a permeability less than or equal to the bottom liner or natural subsoils?	—	—	
Where wastes, waste residues, or contaminated materials remain after closure, during post-closure care (in addition to Subpart G and 265.310 requirements) has the facility: 265.228(b)-			
(1) Maintained the integrity and effectiveness of the final cover, and made repairs as necessary?	—	—	
(2) Maintained and monitored the groundwater monitoring system (and complied with all other applicable Subpart F requirements)?	—	—	
(3) Prevented run-on and run-off from eroding or damaging the final cover?	—	—	

GENERATORS OF HAZARDOUS WASTE
CEI Checklist

SITE ID# CAD 005130455 INSPECTION DATE: _____

SITE NAME: The O'Brien Corporation

LOCATION: 450 E. Grand Ave.

South San Francisco (City) CA (State) 94080 (Zip)

LEAD INSPECTOR: Richard Wheeler OFFICE: NCCR

TYPE OF INSPECTION: GENERATOR ONLY ___ GENERATOR PORTION OF CEI ✓

OTHER Interim Status, + Land Ban

INDEX FOR GENERATOR CHECKLIST

NOTE: This checklist is designed to be used with the regulations, not to replace them. You should understand the cited section before answering the question. Sections cited are shown in brackets, with the number before the slash being the State citation and the number after the slash being the Federal citation: [State/Federal]. A dash only on one side of the slash indicates there is no corresponding State or Federal citation.

PK Revised 3/15/89

Attachment #2

	Yes	No	Comment
Generators - General			
Has the generator of solid wastes made a hazardous waste (H.W.) determination by determining if the waste is:			
Excluded from regulation under 261.4? [-/262.11(a)]	—	—	N/A
Listed as a H.W. in CCR Articles 9 & 11 or 261 Subpart D? [66471(a)/262.11(b)]	✓	—	
Exhibits characteristic identified in Article 11, CCR/261 Subpart C , by either: [66471(b)-/261.11(c)-]			
(1) Testing the waste?	✓	—	
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the process used?	✓	—	
Excluded or restricted under 264, 265, or 268, if determined hazardous? [-/262.11(d)]	—	—	N/A

Note: See Part 268 checklist for Land Ban restricted wastes generator requirements.

Has the generator applied for and obtained an EPA ID number before treating, storing, disposing of, transporting, or offering for transport their H.W.? [66472(a)&(d)/262.12(a)]	✓	—	
Have they offered H.W. only to transporters or TSDs with an EPA ID#? [66472(c)/262.12(c)]	✓	—	
Generator does not handle or dispose of extremely hazardous waste except in compliance with a permit from the Department? [66570/-]	✓	—	

	Yes	No	Comment
Manifests - Continued			
Has the generator submitted a legible copy of each manifest to the Department within 30 days? [25160 &66484(f)/-]	✓		
Pre-Transport Requirements			
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? [66504(a)/262.30]			N/A No containers
Are waste packages labelled in accordance with DOT regulations (40 CFR 172.101)? [66504(b)/262.31]			
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? [66504(b)/262.32(a)] including:			
Proper shipping name (table column 2)?			
Proper ID number (table column 3A)?			
Proper ORM designation for containers of ORM-A,B,C,D or E wastes?			
Are containers of 110 gallons or less marked with the following words? [66504(c)/262.32(b)]			
HAZARDOUS WASTE-Federal Law prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. Generators Name & Address _____ Manifest Document Number _____			
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? [66504(b)/262.33]			

	Yes	No	Comment
If the generator has stored H.W. on-site for more than 90 days*, have they: [66508(b)/262.34(b)]			
Been granted an extension? or:	___	___	N/A
Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270?	___	___	

* Except at the point of initial generation in compliance with 25123.3(d)/262.34(c). (see "Generation Points", Page 6)

Is each container ~~or tank~~ clearly marked with the words "Hazardous Waste"? [66508(a)(3)/262.34(a)(3)]	___	___	N/A
<u>Generators accumulating waste in containers</u> Reference 66508(a)(1)/262.34(a)(1)			
Are containers visibly marked with the date accumulation started? [66508(a)(2)/262.34(a)(2)]	___	___	N/A No Containers were present. Facility has eliminated waste stream using containers
Does each container have a label which includes the following information: [66508(c)-/-]			
(1) Composition and physical state of the waste?	___	___	
(2) Statement(s) on the hazardous property(ies) of the waste?	___	___	
(3) Name and address of the waste generator?	___	___	
Does the generator transfer wastes from containers in poor condition to sound containers, or otherwise manage the waste in compliance with regulations? [67241/265.171]	___	___	
Containers are compatible with the waste to be stored? [67242/265.172]	___	___	
Are containers of H.W. closed except when necessary to add or remove wastes? [67243(a)/265.173(a)]	___	___	
Are containers of H.W. handled to prevent rupture and leakage? [67243(b)/265.173(b)]	___	___	
Does the generator inspect container storage areas at least weekly? [67244/265.174]	___	___	

	Yes	No	Comment
Generators accumulating waste in tanks - Continued			
Does the generator inspect: [67259(a)-/-]			
(1) Discharge control equipment each operating day?	—	—	N/A None Such
(2) Data from monitoring equipment each operating day?	—	—	
(3) The level of waste in the tank each operating day?	—	—	
(4) Tank construction materials weekly for corrosion and leaks?	—	—	
(5) Discharge confinement structure and area weekly for erosion or leaks?	—	—	
If a tank has been closed, were all H.W. and constituents removed from tank and appurtanences, and was all contamination removed? [67260/-]	—	—	
Ignitable or reactive wastes are not placed in a tank unless proper precautions are taken? [67261(a)/-]	—	—	
Tank storage of ignitable or reactive waste meets NFPA buffer zone requirements? [67261(b)/-]	—	—	
Incompatible wastes or wastes and materials are not placed in the same tank, or in a tank which previously held an incompatible waste or material, unless proper precautions (per 67106(b)) are taken? [67262/-]	—	—	
Volume of waste in single tank does not exceed 5,000 gals. or 45,000 lbs. unless generator has a permit, or it is a portable tank holding H.W. for 60 days or less from onsite maintenance which is performed less than annually? [25123.3(a)(2)/-]	—	—	

	Yes	No	Comment
Recordkeeping and Reporting - Continued			
For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA? [66484(g)/262.42(b)]	—	—	N/A
Did the Exception Report include: [66484(g)(1)/262.42(b)(1)]			
(1) A legible copy of the manifest?	—	—	
(2) A signed cover letter explaining the efforts taken to locate the H.W. and the results of these efforts?	—	—	
Has the generator submitted an annual report to the Board of Equalization? [25342/-]	✓	—	
Training			
Have facility personnel successfully completed H.W. training program which is directed by a qualified person, and which addresses all required topics? [67105(a)/265.16(a)]	✓	—	
Have personnel completed the required training within 6 mos after their employment date, and not worked unsupervised until completing the training? [67105(b)/265.16(b)	✓	—	
Have personnel taken part in an annual review of initial training? [67105(c)/265.16(c)]	✓	—	
Do personnel records include for each H.W. position: [67105(d)-/265.16(d)-]			
(1) Job title and name of person filling the position?	✓	—	Roy Rossi Foreman
(2) Job description?	✓	—	
(3) Description of required training?	✓	—	
(4) Documentation that training or experience has been completed?	✓	—	
Are personnel records kept for current employees until closure, and past employees for at least three years? [67105(e)/265.16(e)]	✓	—	

	Yes	No	Comment
Preparedness and Prevention - Continued			
Has the facility documented any refusal to enter into such arrangement? [67126(b)/265.37(b)]	___	___	N/A
Contingency Plan and Emergency Procedures			
Does the facility have a contingency plan designed to minimize hazards from H.W. incidents? [67140(a)/265.51(a)]	✓	___	
Have the provisions of the plan been carried out immediately when there is a H.W. incident which could threaten human health or the environment? [67140(b)/265.51(b)]	___	___	N/A
Does the plan describe action personnel must take to respond to emergencies? [67141(a)/265.52(a)]	✓	___	
Does the plan describe the arrangements agreed to in 67126/265.37? [67141(c)/265.52(c)]	✓	___	
Does the plan list names, addresses and phone numbers (office and home) of all qualified ECs, and name one as primary EC with the others listed in order of responsibility? [67141(d)/265.52(d)]	✓	___	
Does the plan list all emergency equipment including the location, physical description, and outline of capabilities? [67141(e)/265.52(e)]	✓	___	
Does the plan include an evacuation plan with signals to begin evacuation, evacuation routes and alternate routes? [67141(f)/265.52(f)]	✓	___	
Is a copy of the plan, and all revisions to the plan: [67142-/265.53-]			
(a) Maintained at the facility?	✓	___	
(b) Submitted to all entities with designated response rolls?	✓	___	

STATE OF CALIFORNIA--HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

LAND BAN GENERATOR INSPECTION REPORT

EPA ID#: CAD 005 130 455

Facility Name: The O'Brien Corporation

Facility Location: 450 E. Grand Ave.
South San Francisco, CA 94080

Inspected By: Richard Wheeler

Date of Inspection: September 26, 1989

Background: This inspection was conducted as part of the Department's RCRA grant workplan commitment, and was intended to assess the facility's compliance with the federal requirements contained in 40 CFR Part 268.

Persons Present:

O'Brien Corp.- Don Mazzone, Plant Mgr.

DHS/TSCP - Richard Wheeler, AHMS

Sr. HMS/Sr. WME_____ DATE of REPORT_____

Attachment #3

Land Disposal Restrictions
(Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			
F001 thru F005 spent solvents?	✓		Wash Thinner Rusted (F003) Acetone, Toluene, Xylene etc. See analysis
F020-23 and F026-28 Dioxins?		✓	
"California List" wastes?	✓		Lead, Barium, Chromium
First Third scheduled wastes?		✓	

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt small quantity generators? 268.1(c)(3)(all)		✓	
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(4)		✓	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		✓	

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)			N/A
A no-migration petition has been granted under 268.6, for the wastes and units involved? (See 40 CFR 268.6(e-f) for operating requirements.) 268.1(c)(2)(all), 268.30(d)(2)(F001-5), 268.31(d)(2)(dioxins), 268.32(g)(1)(CA list), 268.33(e)(2)(1st 3rd)			
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)			

* Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
Generators: Waste Analysis			
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	✓	—	Restricted Wastes are recycled
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	✓	—	
Did the generator determine if liquid CA list wastes have a pH of less than or equal to 2? 268.32(j)(1)	✓	—	
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	—	—	N/A No PCB
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	—	—	N/A
Notices, Certifications, and Demonstrations:			
If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	✓	—	
(i) EPA H.W. number?	✓	—	
(ii) Appropriate treatment standards and prohibitions?	✓	—	
(iii) Manifest # for the waste?	✓	—	
(iv) Available waste analysis data?	✓	—	
If the waste is determined to be restricted but not require further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	—	—	N/A
Did the notification include: 268.7(a)(2)(i)-			
(A) EPA H.W. number?	—	—	
(B) Appropriate treatment standards and prohibitions?	—	—	
(C) Manifest # for the waste?	—	—	
(D) Available waste analysis data?	—	—	

	Yes	No	Comments
Generators of First Third "soft hammer" wastes (268.33(f)) shipped for land disposal:			
Prior to shipment for land disposal, has the generator certified and submitted to the R.A. a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit? 268.8(a)(1-2)	—	—	N/A
Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)	—	—	
Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste, and the certification with each shipment of waste? 268.8(a)(3) or -(4)	—	—	
Are copies of the demonstration and certification kept on site for at least five years? 268.8(a)(3) or -(4)	—	—	
If the generator determined there is no practical treatment for his waste, did the demonstration include a written discussion and the following certification? 268.8(a)(2)(i)	—	—	

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If the generator determines that there are practical treatments for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)	—	—	N/A
Did they include the following certification? 268.8(a)(2)(ii)	—	—	

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
Treatment Facilities: Waste Analysis			
Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)	___	___	N/A Not treating
Where treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)	___	___	
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	___	___	
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	___	___	
Notifications and certifications:			
Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)			
(i) EPA H.W. number?	___	___	
(ii) Corresponding treatment standard?	___	___	
(iii) Manifest # for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	___	___	
For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read: 268.7(b)(5)(i)	___	___	

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Land Disposal Restrictions - Continued
(Part 268)

	Yes	No	Comments
Treatment in surface impoundments exemption:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			
(1) Treated, not just stored, the wastes in the impoundment?	___	___	N/A
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?	___	___	
(2)(ii) Removed annually all treatment residues (including liquids) that do not meet treatment or prohibition standards?*	___	___	
(2)(iii) Not placed the residues in another impoundment for subsequent management?*	___	___	
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a)) and that the facility is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)	___	___	
Is there a principal means of treatment other than evaporation of H.W. constituents? 268.4(b)	___	___	
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?	___	___	
(ii) The analysis of test data?	___	___	
(iii) The annual removal of residues which exhibit a H.W. characteristic, and:			
(A) Fail 268 Subpart D treatment standards? or:	___	___	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			
(1) 268.32 (CA list) or RCRA 3004(d)?	___	___	
(2) 268.33(f) (1st 3rd)?	___	___	

* Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Identified TSFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980892897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co Inc
CAT080010101	Appropriate Technologies
CAD074644659	Baron Blakeslee
CAT000618652	Baron-Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp, San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co
CAT080012651	Orange County Chemical Co
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corp
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
CAT000613935	Safety Kleen
CAT000613919	Safety Kleen
CAD066177783	Safety Kleen
CAT000613893	Safety Kleen
CAT000613976	Safety Kleen
CAT000613992	Safety Kleen
CAT000613950	Safety Kleen
CAT000613927	Safety Kleen
CAD080916968	Safety Kleen
CAD980892475	Safety Kleen
CAT000613984	Safety Kleen
CAD053044053	Safety Kleen
CAD980817159	Safety Kleen
CAT000613943	Safety Kleen
CAT000613968	Safety Kleen
CAD059494310	Solvent Services
CAT080033681	Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338	Eticam

ID#	Name/Address	Accepted w/o Certification?

F001-F005 spent solvents. Treatment standards effective 11/8/86.	Treatment Standard (mg/l) Wastewaters	All Other Wastes*
Acetone	0.05	0.59
n-Butyl alcohol	5.00	5.00
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols	2.82	0.75
Cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.00	5.00
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride from pharmaceutical industry	12.70 *	0.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloroethane	1.05	0.96
1,1,2-Trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

* The treatment standards in this treatability group are based on incineration.

F020, F021, F022, F023, F026, F027 or F028 dioxin containing wastes. These treatment standards become effective 11/8/88.	Treatment Standard
HxCDD-All Hexachlorodibenzo-p-dioxins	< 1 ppb
HxCDF-All Hexachlorodibenzofurans	< 1 ppb
PeCDD-All Pentachlorodibenzo-p-dioxins	< 1 ppb
PeCDF-All Pentachlorodibenzofurans	< 1 ppb
TCDD-All Tetrachlorodibenzo-p-dioxins	< 1 ppb
TCDF-All Tetrachlorodibenzofurans	< 1 ppb
2,4,5-Trichlorophenol	< 0.05 ppm
2,4,6-Trichlorophenol	< 0.05 ppm
2,3,4,6-Tetrachlorophenol	< 0.10 ppm
Pentachlorophenol	< 0.01 ppm

Note: Where a single constituent is addressed under more than one rulemaking, the applicable treatment standard or prohibition level is that for the more specific waste stream.

* Expired 8/17/88. 0.20 mg/l standard now applies.

"California List" wastes: (except in an injection well)

CA Waste Code	Restricted Waste:	Effective date:
711	Liquids with cyanides ≥ 1000 mg/l	7/8/87
721	" " arsenic ≥ 500 mg/l	"
722	" " cadmium ≥ 100 mg/l	"
723	" "chromium (VI) ≥ 500 mg/l	"
724	" " lead ≥ 500 mg/l	"
725	" " mercury ≥ 20 mg/l	"
726	" " nickel ≥ 134 mg/l	"
727	" " selenium ≥ 100 mg/l	"
728	" " thallium ≥ 130 mg/l	"
731	" " PCBs ≥ 50 mg/L	"
791	Liquid H.W. having a pH ≤ 2	7/8/87
741	Liquid H.W. that is primarily water and contain HOCs in total concentration ≥ 1,000 mg/l and less than 10,000 mg/l HOCs (listed on p.268: X)	"
751	H.W. having ≥ 1,000 ppm HOCs, that is not primarily water, and after 7/8/87 the disposal unit met 268.5(h)(2) minimum tech. requirements	11/8/88
	Contaminated soil or debris not resulting from a CERCLA response action or RCRA corrective action, and after 7/8/87 the disposal unit met 268.5(h)(2) requirements	7/8/89
	Contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action, and after 11/8/88 the disposal unit meets 268.5(h)(2) requirements	11/8/90

Note: The prohibitions and effective dates above do not apply where a specified HOC is listed in 268 Subpart C (e.g. a H.W. chlorinated solvent under F001-5, or a 1st 3rd K086 solvent wash) 268.32(h)

First Third Wastes: (except in an injection well)	Effective Date:
First Third wastes, types, and concentrations listed in the following pages, and not detailed below	8/8/88
"Soft hammer" wastes with a valid demonstration and certificate	5/8/90
K048-52 and K061 wastes containing 15% zinc or greater, and after 8/8/88 are disposed of in a 268.5(h)(2) minimum tech. unit	8/8/90
Contaminated soils and debris with treatment standards based on incineration, and after 8/8/88 are disposed of in a 268.5(h)(2) minimum tech. unit	8/8/90
Various "soft hammer" wastewater residues with <1% TOC and <1% suspended solids: metals recovery or precipitation, cyanide destruction, carbon absorption, chemical oxidation, steam stripping, biodegradation, incineration or other direct thermal destruction. (268.12(b))	5/8/90
Leachate from the storage, disposal, or treatment of "soft hammer" wastes	5/8/90
First Third-only mixed radioactive/hazardous wastes	5/8/90

Concentration (in mg/kg)
14
Concentration (in mg/l)
0.27
2.0
.24
.11
.027
Concentration (in mg/kg)
13
Concentration (in mg/l)
0.028
2.0
.24
.11
.027
Concentration (in mg/kg)
5.6
6.0
5.6
5.6
5.6
-
Concentration (in mg/l)
4.5
.15
.61
.073
1.4
Concentration (in mg/kg)

K104 wastewaters	Concentration (in mg/l)
Nitrobenzene	.073
Phenol	1.4
Cyanides (Total)	2.7

No Land Disposal for:

K004 Nonwastewaters [Based on No Generation]
K008 Nonwastewaters [Based on No Generation]
K015 Nonwastewaters [Based on No Ash]
K021 Nonwastewaters [Based on No Generation]
K025 Nonwastewaters [Based on No Generation]
K036 Nonwastewaters [Based on No Generation]
K044 [Based on Reactivity]
K045 [Based on Reactivity]
K047 [Based on Reactivity]
K060 Nonwastewaters [Based on No Generation]
K061 Nonwastewaters—High Zinc Subcategory (greater than or equal to 15% total zinc) [Based on Recycling]: effective 8/8/90
K069 Nonwastewaters—Non-Calcium Sulfate Subcategory [Based on Recycling]
K083 Nonwastewaters—No Ash Subcategory (less than 0.01% total ash) [Based on No Ash]
K100 Nonwastewaters [Based on No Generation]

(b) When wastes with differing treatment standards for a constituent of concern are combined for purposes of treatment, the treatment residue must meet the lowest treatment standard for the constituent of concern.

17. In § 268.44, paragraph: (l) are added to read as foll

§ 268.44 Variance from a trea standard.

• • • • •

(h) Where the treatment s expressed as a concentratio or waste extract and a wast under conditions specific to site cannot be treated to the level, or where the treatmen is not appropriate to the wa: generator or treatment facili apply to the Assistant Admi the Office of Solid Waste ar Emergency Response, or his representative, for a site-spe variance from a treatment s applicant for a site-specific must demonstrate that beca physical or chemical proper waste differs significantly fr waste analyzed in developir treatment standard, the was treated to specified levels or specified methods.

(i) Each application for a variance from a treatment st must include the information § 260.20(b)(1)–(4);

(j) After receiving an appl site-specific variance from a standard, the Assistant Adm or his delegated representat request any additional infor samples which may be requi evaluate the application.

(k) A generator, treatment disposal facility that is mana waste covered by a site-spec variance from a treatment st must comply with the waste requirements for restricted v under § 268.7.

TABLE 1.—REGULATIONS IMPLEMENTING THE HAZARDOUS

Promulgation date	Title of regulation
• • • •	
[Insert date of promulgation of final rule in the Federal Register].	Land disposal restrictions for First Tr wastes.
• • • •	

K020 nonwastewaters	Concentration (in mg/kg)
Tetrachloroethene	6.0

K020 wastewaters	Concentration (in mg/l)
1,2-Dichloroethane	0.007
1,1,2,2-Tetrachloroethane	.007
Tetrachloroethene	.007

K022 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Acetophenone	19
Sum of Diphenylamine and Diphenylnitrosamine	13
Phenol	12
Toluene	0.034

K024 nonwastewaters	Concentration (in mg/kg)
Phthalic acid	28

K024 wastewaters	Concentration (in mg/l)
Phthalic acid	0.54

K030 nonwastewaters	Concentration (in mg/kg)
Hexachlorobutadiene	5.6
Hexachloroethane	28
Hexachloropropene	19
Pentachlorobenzene	28
Pentachloroethane	5.6
1,2,4,5-Tetrachlorobenzene	14
Tetrachloroethene	6.0
1,2,4-Trichlorobenzene	19

K030 wastewaters	Concentration (in mg/l)
o-Dichlorobenzene	0.008
p-Dichlorobenzene	.008
Hexachlorobutadiene	.007
Hexachloroethane	.033
Pentachloroethane	.007
1,2,4,5-Tetrachlorobenzene	.017
Tetrachloroethene	.007
1,2,4-Trichlorobenzene	.023

K037 nonwastewaters	Concentration (in mg/kg)
Disulfoton	0.1
Toluene	28

K037 wastewaters	Concentration (in mg/l)
Disulfoton	0.003
Toluene	.028

K048 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Benzene	9.5
Benzo(a)pyrene	.84
Bis(2-ethylhexyl)phthalate	37
Chrysene	2.2
Di-n-butyl phthalate	4.2
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Pyrene	2.0
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K048 wastewaters	Concentration (in mg/l)
Benzene	0.011
Benzo(a)pyrene	.047
Bis(2-ethylhexyl)phthalate	.043
Chrysene	.043
Di-n-butyl phthalate	.060
Ethylbenzene	.011
Fluorene	.050
Naphthalene	.033
Phenanthrene	.039
Phenol	.047
Pyrene	.045
Toluene	.011
Xylenes	.011
Chromium (Total)	.20
Lead	0.37

K049 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Anthracene	6.2
Benzene	9.5
Benzo(a)pyrene	0.84
Bis(2-ethylhexyl)phthalate	37
Chrysene	2.2
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Pyrene	2.0
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K049 wastewaters	Concentration (in mg/l)
Anthracene	0.039
Benzene	.011
Benzo(a)pyrene	.047
Bis(2-ethylhexyl)phthalate	.043
Carbon disulfide	.011
Chrysene	.043
2,4-Dimethylphenol	.033
Ethylbenzene	.011
Naphthalene	.033
Phenanthrene	.039

K049 wastewaters	Concentration (in mg/l)
Phenol	047
Pyrene	.045
Toluene	011
Xylenes	011
Chromium (Total)	20
Lead	037

K050 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Benzo(a)pyrene	= 0.84
Phenol	2.7
Cyanides (Total)	1.8

K050 wastewaters	Concentration (in mg/l)
Benzo(a)pyrene	0.047
Phenol	.047
Chromium (Total)	.20
Lead	.037

K051 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Anthracene	6.2
Benzene	9.5
Benzo(a)anthracene	1.4
Benzo(a)pyrene	.84
Bis(2-ethylhexyl)phthalate	37
Chrysene	2.2
Di-n-butyl phthalate	4.2
Ethylbenzene	67
Naphthalene	[Reserved]
Phenanthrene	7.7
Phenol	2.7
Pyrene	2.0
Toluene	9.5
Xylenes	[Reserved]
Cyanides (Total)	1.8

K051 wastewaters	Concentration (in mg/l)
Acenaphthene	0.050
Anthracene	.039
Benzene	.011
Benzo(a)anthracene	.043
Benzo(a)pyrene	.047
Bis(2-ethylhexyl) phthalate	.043
Chrysene	.043
Di-n-butyl phthalate	.060
Ethylbenzene	.011
Fluorene	.050
Naphthalene	.033
Phenanthrene	.033
Phenol	.047
Pyrene	.045
Toluene	.011
Xylenes	.011
Chromium (Total)	.20
Lead	.037

O'BRIEN CORPORATION

Chemical Analysis
of
Wash Thinner

(Sent to Romic Chemical Corp. to be Reclaimed for Reuse)

June 15, 1989

SM 2711 (481-07)

REPORTED AS % OF COMPOUND BY WEIGHT

Water	0.1	Toluene (TF)	10.1
Aliphatics (F)	6.9	Normal Butyl Acetate (TF)	5.1
Acetone (F)	4.4	Xylene (TF)	25.9
Methylethylketone (TF)	21.0	Cellusolve Acetate (F)	1.8
Isopropanol (TF)	14.2	Cyclohexanon (F)	2.5
Methylisobutylketone (F)	4.1	Mineral Spirit (F) (Types Highboilers)	3.9

* Information furnished by O'Brien and restated for clarity and to show potential hazardous properties of compounds.

T = Toxic
F = Ignitable

COPY

[illegible] Shipment Record

To [illegible] - IPF -- 1989

by O'Brien Corp.

Date of pick up	gallons picked up	gallons returned	gallons waste	Disposal cost 54381-7303	+ wt Reclaim cost 64211-6604	Total cost	Invoice #	P.O. #	Manifest #
1/3/89	3658	2532	1126	1407.50	3701.72	5109.22	13708	815327	881200[illegible]
[illegible]/89	3350	3840	1669	2086.35	5211.40	7297.65	13817	815415	881166[illegible]
1/31/89	4429	3075	1354	1692.50	4494.50	6187.00	14059	815460	8820262
2/6/89	4896	3419	1477	1846.25	4996.74	6842.99	14120	815473	8820263
2/27/89	4410	3083	1327	1725.10	4506.[illegible]	6231.28	14353	815365	8820272
3/3/89	4812	3380	1432	1926.60	4866.80	6793.40	14428	815389	882027[illegible]
3/8/89	4429	3100	1329	1727.70	4531.00	6258.70	14519	799527	882027[illegible]
3/28/89	4458	3180	1278	1661.40	4647.80	6309.20	14788	799623	882023[illegible]
4/11/89	[illegible]	—	1225	1592.50	—	1592.50	14954	799580	88202[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	4513.22	6115.12	15027	[illegible]	8820[illegible]
5/[illegible]/89	[illegible]	3623	[illegible]	1583.40	4026.53	[illegible]	[illegible]	803508	88202[illegible]
5/19/89	5785	4203	1582	2056.60	4670.33	6726.93	15473	803560	88202[illegible]
6/7/89	[illegible]	3288	1282	1666.60	3654.68	5321.28	15716	806082	8820[illegible]
[illegible]	4445	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]122	8820[illegible]
[illegible]	[illegible]	2432	[illegible]	1557.40	3259.52	[illegible]	15899	806133	8820[illegible]
7/12/89	4610	3492	1118	1453.40	3882.12	5335.52	16168	805856	88203[illegible]
7/24/89	5336	3964	1372	1783.60	4406.04	6189.64	16291	805918	88203[illegible]
8/4/89	[illegible]	3255	1431	1860.30	3618.05	5479.35	16442	805940	882039[illegible]
8/14/89	4125	2815	1310	1703.00	3130.65	4833.65	16630	81[illegible]21	882039[illegible]
8/21/89	4445	3178	1267	1647.10	3533.52	[illegible]	[illegible]	[illegible]83	882039[illegible]
9/1/89	4610	3218	1392	1807.60	3577.92	5387.52	16706	814451	882040[illegible]

attachment #5

PHOTO DISPLAY
The O'Brien Corporation
450 East Grand Ave.
South San Francisco
California 94080

taken on September 26, 1989
by
Richard A. Wheeler, AHMS

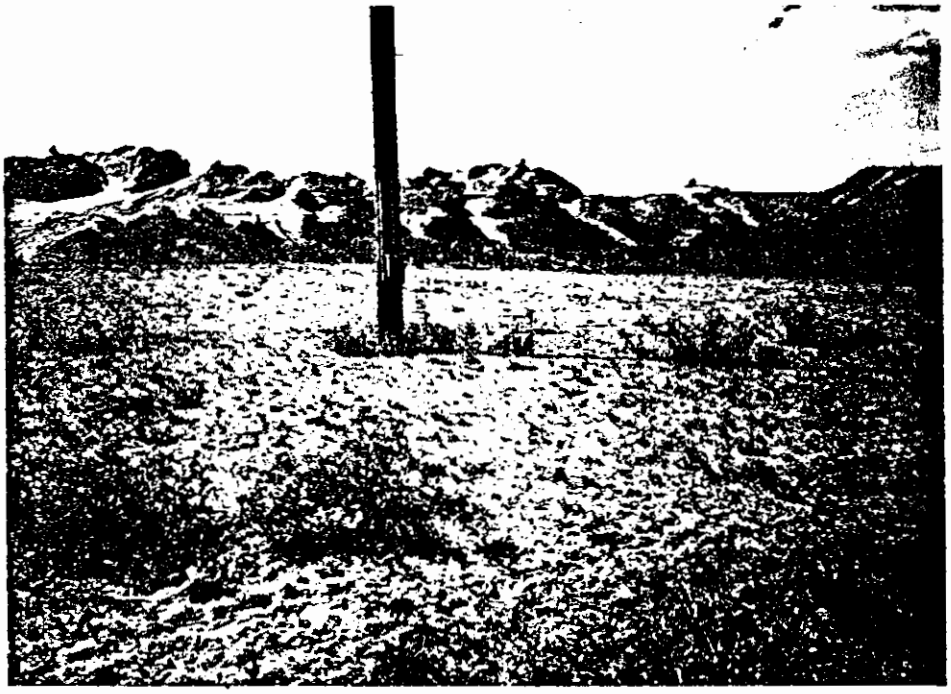
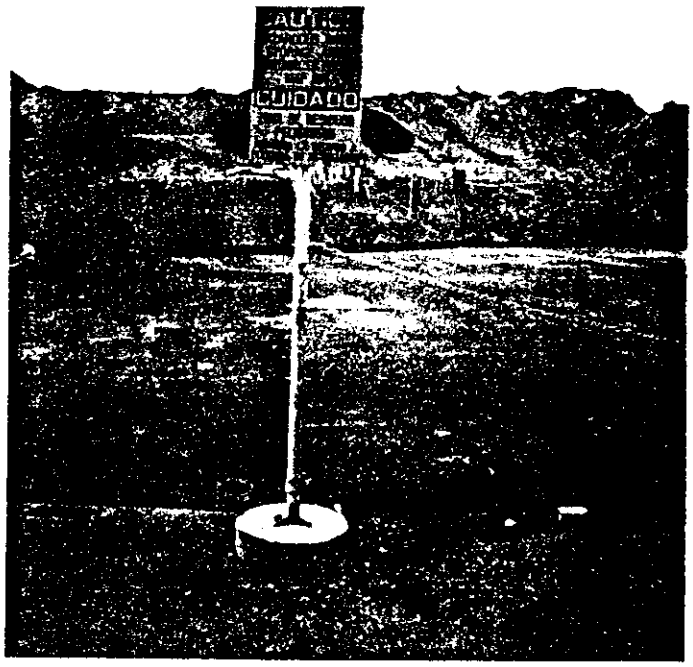


Photo #1. Showing area previous occupied by three (3) surface impoundments, now undergoing closure.

Photo #2. Showing groundwater monitoring well in foregound and three others in background on former surface impoundment area.

Photo # 3. Showing drum storage area no longer being used for drum storage.

Photo #4. Showing warning sign and containment details of drum storage area.



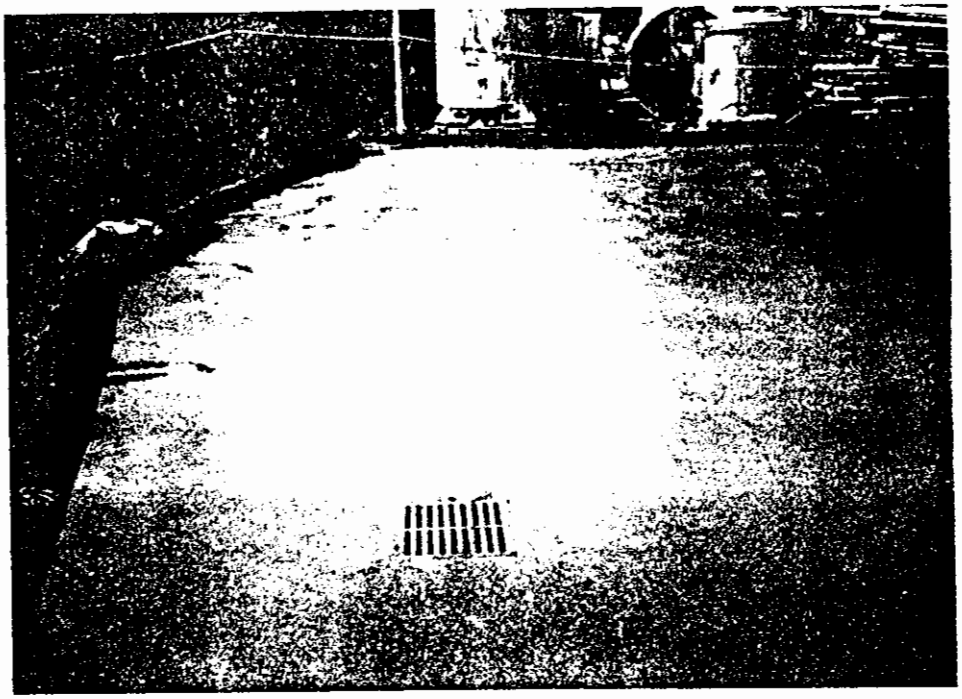
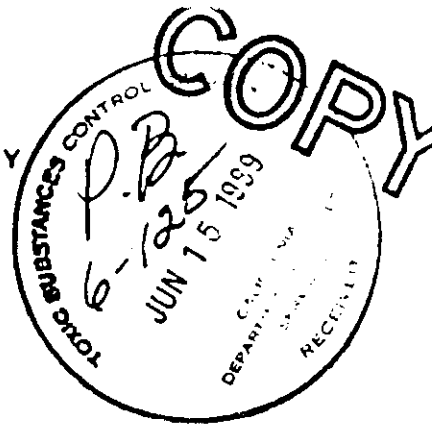


Photo #5. Showing containment detail of drum storage area. Drain in foreground goes to sump that is pumped out and tested for HW after each rain storm.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105



14 JUN 1989

Ms. Patricia L. Houle
Environmental Manager
The O'Brien Corporation
450 East Grand Avenue
South San Francisco, CA 94080

Re: Summary of EPA Position on Corrective Action Requirements for the O'Brien Facility Presented During the May 19, 1989 Technical Meeting

Dear Ms. Houle:

At the close of our meeting on May 19, 1989, I indicated that I would submit a written version of my comments to you concerning the Environmental Protection Agency's (EPA's) position on the status of corrective action at the O'Brien facility (facility). As you recall, the following areas of investigation were discussed:

- Breakwater
- Warehouse
- Suspected Former Landfill
- Abandoned Sewer Outfalls
- Underground Tank Closures
- Suspected Toluene Release
- Marsh Area
- ISD Groundwater Monitoring Workplan
- SWMUs from RFA

Over the course of our discussions, I offered comments on both the CME Workplan and the San Bruno Channel Fill Investigation (SBCFI) report. These two documents discuss, in varying levels of detail, the areas of investigation listed above. Since our meeting, I have received comments on the CME Workplan from the Department of Health Services (DHS), which are incorporated in this document. While DHS has not compiled comments on the SBCFI report as of this date, such comments are expected shortly. For reasons dicussed previously, the Regional Water Quality Contol Board (RWQCB) probably will not be in a position to offer comments on the corrective action at the facility for at least a couple months.

Before dealing with each of the areas of investigation separately, I would like to re-emphasize some general concerns with regard to corrective action at the facility. Specifically,

Attachment #7

It is EPA's position that a post-closure permit will be required for the three closed surface impoundments because the post-closure permit applicability requirement has been met (i.e., certified closure occurred after the January 26, 1983 cut-off date-40 CFR §270.1(c)), and groundwater contamination downgradient of the surface impoundments has been demonstrated. The latter statement is supported by analytical data that shows lead levels in excess of the lead maximum concentration limit (MCL) in monitoring wells downgradient of the surface impoundments. I indicated during the meeting that EPA would consider a demonstration by the facility that sources other than the surface impoundments (i.e., elevated upgradient soil or groundwater contamination) have caused the elevated levels of lead in downgradient wells. It should be noted, however, that conclusively demonstrating that the residual lead levels in the surface impoundment area have not contributed significantly to the elevated lead levels in the groundwater will be very difficult due to the hydrogeologic complexities at the facility.

Commonly, while a facility is in the process of implementing a RCRA Facility Investigation (RFI), areas (SWMUs) are encountered for which little operational information exists. For this reason, a broad suite of compounds, frequently EPA's Appendix IX, is chosen for analytical purposes at some representative locations. Due to the fact that O'Brien has performed volatile and semi-volatile organic analyses, as well as ISD parameter monitoring, a limitation on the number of analytes for some SWMUs will be possible. The MW-21 area, however, is one area where a broad analytical list is appropriate due to the limited amount of information currently available. Therefore, one Appendix IX analysis should be performed on a groundwater sample from MW-21. The exact analytical list for other SWMUs will be determined on a case-by-case basis, in consideration of O'Brien's Road Map report. As a final note on analytical matters, it is EPA's understanding that O'Brien, in all future analyses, will run STLC analyses on soil samples whenever total metals concentrations are greater than ten times the STLC levels.

Shortly after our meeting began, it was suggested that rather than undertake a debate on the issues pertaining to each SWMU, O'Brien would respond to the Agency comments in a written reply. It is EPA's understanding, therefore, that O'Brien will submit a Road Map report detailing the operational history and degree of investigatory work completed for each SWMU. While other supporting documents will be referenced, this Road Map will be a stand-alone report.

Listed below are EPA and DHS comments on the CME Workplan, and EPA comments on the SBCFI report:

Appendix IX analysis should be run on the groundwater. If hazardous constituents are found that are clearly not of an O'Brien (or previous owner) source, this would support the off-site origin of the contaminants. Soil sampling should also be performed in the vicinity of well MW-21.

Abandoned Sewer Outfalls: While the sewer outfalls have been addressed in the SBCFI report, it is a concern to the Agencies that only one of the original twelve outfalls (not breakwater conduits) was located during the study. An explanation should be provided for this information gap.

Underground Tank Closures: Based on my file review, it appears that the agencies have little information on these tank closures. For this reason, O'Brien must submit a complete record of these closures to include, at a minimum, the number of tanks involved, their locations, engineering logs of the excavation and removal, descriptions of the products/wastes contained, the final disposition of the tanks and tank contents, decontamination procedures, nature and composition of backfill, and the names of the personnel who oversaw the closures.

Suspected Toluene Release: While this section of the SAWP refers to four quarters of groundwater monitoring data from well MW-19 that show no detectable concentrations of any priority organic compounds in the toluene spill area, O'Brien must reconcile the elevated levels of toluene (7,000 ppb) and ethylbenzene (120 ppb) that were found in well W-6 (page 21 of EPA RCRA Facility Assessment). Again, it is assumed that the Road Map report will discuss, in detail, the existing analytical data for this area.

Marsh Area: EPA has reviewed the SBCFI report that was submitted in March of this year. Four conclusions drawn by O'Brien from the study are:

1) The average bay water dissolved lead concentration exceeds the average fill pore water dissolved lead concentration.
2) Bay sediment lead concentrations are less than the 200 ppm lead background level that was chosen for use in the study.
3) Fill pore water dissolved lead levels are relatively low even in areas characterized by high total lead.
4) Fill pore water dissolved lead levels are consistently below the lead levels obtained by running bay water extraction tests.

The overall conclusion from the study is that the elevated-lead that occurs in "hot spots" (above the TTLC level) in the fill area is essentially immobile and, as such, is not

dix IX) should be run on a representative number of samples. While a portion of this lead contamination may be attributable to contaminated debris being used as fill for this area in the 60's and early 70's, it is up to O'Brien to demonstrate this contribution. It is also requested that O'Brien explain why the sample collected at AB2 was not analyzed.

One of the main conclusions of the SBCFI report is that the average bay water dissolved lead concentration exceeds the average fill pore water dissolved lead concentration. The average for the fill pore water was arrived at, however, by including a large group of below-detection concentrations in the eastern portion of the sampled area that lie south of the "creek" discharge point. As this area of the fill is conceivably outside of the influence of fill contaminants, inclusion of these data points is probably not statistically sound, and results in an artificially low average fill pore water dissolved lead concentration. Additionally, the more highly elevated fill pore water dissolved lead concentrations (1.30, 0.64 and 0.43 ppm) are significantly higher than the maximum bay water dissolved lead concentration (0.28 ppm). Thus, it is probably more likely that the fill pore water is contaminating the bay water than vice-versa. As a final note on the SBCFI report, EPA is concerned that no bay water samples were collected in truly "open" waters (i.e., not contiguous to the shoreline). If a true background level for lead in bay water is being sought, samples should be collected from areas well off-shore.

ISD Groundwater Monitoring Workplan: While EPA agrees that any modifications to the existing groundwater monitoring system should be delayed until the submittal of the Hydrogeologic Assessment Report (HAR) Addendum, several improvements to the system will probably be required. The following aspects relating to the current understanding of the site hydrogeology support this position: the upper aquifer is not defined; stratigraphic Zone B has not been demonstrated to be a laterally continuous aquitard; no monitoring wells have been placed in Zone B; despite being hydraulically upgradient from the impoundments, well MW-21 is probably contaminated; and, well MW-15, originally intended to be an upgradient well for Zone A, may be contaminated by the area previously occupied by the treatment tanks. The issues pertaining to the well MW-21 area and the probable need for a post-closure permit were discussed previously.

SWMUs from the RFA Report: Although 31 total SWMUs are listed in the RFA report, some of these units are being addressed under the CME Workplan, while others will not require further investigation. However, it is assumed that the Road Map report, which O'Brien has agreed to prepare,

Sincerely yours,

Chris Prokop

Chris Prokop
Geologist, EPA-Region IX

cc: Mitch Kaplan, DHS
Patricia Barni, DHS

RECORDS SEPARATOR PAGE

STATE OF CALIFORNIA
DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES
CONTROL DIVISION

MAY 29 1987

HAZARDOUS WASTE

INSPECTION REPORT

DATE of INSPECTION 3/19/87

FIRM NAME O'Brien Corporation

SITE CLASSIFICATION RCRA [✓] Non RCRA [ ]

ADDRESS 450 E. Grand Street

Major [✓] Non Major [ ]

South San Francisco

EPA I.D. No. CAD005130455

EHS/RHS Patti Barni

Date of Submittal April 20, 1987

PEHS

PURPOSE:

Interim Status Document Compliance Inspection

BACKGROUND:

The previous ISD inspection was conducted on May 28, 1986. A Notice of Violation based on the May inspection was issued on June 27, 1986. A referral package incorporating violations observed by both DOHS and the Regional Water Quality Control Board (from RWQCB's May, 1986 ISD groundwater monitoring inspection) was submitted to the Attorney General's office on August 14, 1986 for enforcement action. O'Brien and DOHS signed a Stipulated Order and Schedule of Compliance on March 11, 1987 as a result of the Attorney General's intervention. The conditions of the order and schedule included the submittal of closure and post closure plans, the installation of monitoring wells to ISD specification and compliance with all groundwater monitoring requirements.

PERSONS PRESENT:

Don Mazzone, O'Brien Corporation
Mike Burdine, O'Brien Corporation
Phil Berry, O'Brien Corporation
Randal Friedman, DOHS/TSCD
Patti Barni, DOHS/TSCD

FACILITY DESCRIPTION:

The O'Brien Corporation manufactures paint and resin coatings.

The current status of the O'Brien Corporation's waste units are as follows:

DATE of REPORT 4/24/87

1. Surface impoundments: The surface impoundments have been temporarily backfilled and are awaiting final closure. Closure and Post-Closure Plans are in preparation to be submitted in April, 1987. A groundwater monitoring system was installed in December, 1986. The first set of samples was collected in January, 1987. Results from these samples are pending.

2. Tanks: Two tanks used by O'Brien for storage and treatment of paint washwaters are going through closure. The 10,000 gallon tank has been emptied with the inside being hydroblasted three times with 3,000 psi to bare metal. Mr. Mazzone was given a letter from DOHS dated March 18, 1987 giving permission to cut the tank and sell the metal to a scrap dealer (See Attachment A). The 20,000 gallon tank still contains approximately 4,000 gallons of sludge. This tank, when emptied, will undergo a similar decontamination procedure as used on the 10,000 gallon tank.

Wastes that were previously contained and treated in the tanks are being incorporated into a low cost paint product. The product is a "latex redwood stain" being marketed in the East under a label separate from the O'Brien label.

3. Container Storage: The container storage holds drummed waste from 5 wastestreams, which are as follows:

1. latex sludge wastes generated from the treatment of latex washwaters; This wastestream is being phased out.

2. oil-base sludge

3. filter media (primarily diatomaceous earth containing small quantities of resin coating)

4. pigment bags (containing lead residue)

5. empty drums previously containing acrylonitrile.

Once the latex sludge wastestream is eliminated O'Brien anticipates the generation and storage of approximately 20 drums of hazardous waste per month. The company is currently negotiating a contract with Chemical Waste Management to remove all drummed wastes every 8 weeks. Mr. Mazzone stated the empty acrylonitrile drums are crushed on site using a rented drum crusher and then transported to Kettleman Hills. He stated approximately 2 empty drums are accumulated per month and that the company is looking into eliminating this wastestream.

Mr. Burdine and Mr. Berry stated wastes are placed in the drums at the point of generation and then transferred to a point adjacent to the storage area for labeling at the end of the shift. Mr. Berry stated O'Brien will institute automatic drum labeling at the point of generation instead of at the drum storage area. The facility may resort back to the use of an interim or in-house label prior to the use of the DOT label. Such interim labeling was used briefly last year but was stopped when DOHS cited the facility for failure to label containers in accordance with Section 66508(a) 2, 3 and (c) of Title 22.

OBSERVATIONS:

A. Site tour:

1. Drum Storage: All drums are stored on pallets and are single and double stacked. Several drums were rusted and dented. (See photos 1-3 and 1P-3P). All drums inspected were properly labeled. Accumulation dates noted ranged from May, 1986 to January, 1987. Containerized flammable wastes were stored approximately 50 feet from the perimeter fence. To insure compliance with the 50 foot boundary, O'Brien agreed to move flammable containers to the northernmost edge of the container storage. While inspecting the southern edge of the berm an approximate 6 inch section of the storage floor near the berm was found unpaved and exposing the underlying soil. (see Photos 4, 4P, 5, 5P) A crack in the berm was also noted. Photos 6 and 6b show the soil beneath the berm in the area of the cracked berm is undercut and eroding. The berm is being undercut by a ravine that lends to a tidal arm of San Francisco Bay.

An inventory of the drums stored onsite by wastestream was made during the tour. The field inventory was later compared to O'Brien's operating record and found to be consistent.

Two small closed drains were observed in the drum storage area. Liquids were observed in the drains which Mr. Mazzone stated came from recent rains. He stated that if a spill were to occur, it would be readily detectable within the drain by pigmentation and odor. When liquids accumulate in the drains, if the pH is found to be within the range deemed acceptable by the O'Brien South San Francisco Sanitary District discharge permit, and no odor is detected or pigmentation is observed, the liquids are discharged. When the facility was treating latex washwaters, rainwaters which accumulated in the drains were pumped to treatment tanks. All liquids in the tanks were treated for pH adjustment and to flocculate dissolved solids. Liquids were then discharged to the sanitary sewer. Mr. Mazzone stated that to his

knowledge there had not been any spills or leaks within the storage area.

The safety shower, eyewash, and fire extinguisher adjacent to the storage and tank area all were functional.

2. Treatment/Storage Tanks: The 10,000 gallon tank is empty and clean and currently open at the base. The bare metal is visible as described previously. Both the 10,000 gallon and 20,000 gallon tanks are labeled as hazardous waste and are signed with NFPA placards. The 20,000 gallon tank still contains about 4,000 gallons of sludge. Both tanks are going through formal closure with DOHS.

Surface Impoundments: The surface impoundments have been backfilled and are going through final closure. A closure and post-closure plan is currently being prepared for DOHS/RWQCB review. The entire site is presently fenced and signed. (See photos 7, 7P, and 8)

B. Document Review:

1. Closure Plans: In accordance with the order signed on March 11, 1987 the O'Brien Corp. will within 45 days submit to DOHS closure and post-closure plans for the surface impoundments. O'Brien intends to submit a closure report on the treatment tanks at this time also.

2. Waste Analysis Plan: No deficiencies were noted, however, O'Brien will submit to the Department documents which amend parameter selection rationale and test methods.

3. Contingency Plan: No deficiencies were noted. The facility's Spill Prevention, Control, and Countermeasure plan was not reviewed.

4. Training Plan: No deficiencies were noted. O'Brien will submit documentation to DOHS which identifies personnel to specific job titles. A training memo will be prepared and submitted to DOHS describing procedures for tank inspections.

5. Inspection Records: Inspection records reviewed were adequate. Mr. Burdine was told to inform the employee conducting inspections not to record "OK" if a deficiency was noted. Corrective measures were documented and dated.

6. Annual Report, Manifests, Operating Record, Board of Equalization Reports: All reports reviewed were adequate. Note: Pre-inspection research of O'Brien manifests through use of the Hazardous Waste Information System (HWIS) indicated several manifests from September, 1985 were submitted without identifying the receiving TSD facility. Review of the manifests in question indicated all manifests did in fact have the TSD identified. (ie, Manifests 84843614, 84843616, 84843618).

7. Other Observations: In the review of the O'Brien Part A a question concerning tank capacity was raised. The total capacity identified for storage and treatment in tanks is 60,000 gallons. The tanks onsite have a total capacity of 30,000 gallons. Mr. Mazzone stated he didn't realize the capacity was recorded as such on the Part A, and perhaps the O'Brien official who completed the document may have included process tanks. He stated they have never had underground waste storage tanks on the facility and that waste solvents generated onsite could not make up the 30,000 gallon difference. (See the May 28, 1986 inspection report explaining how O'Brien generates waste solvents).

VIOLATIONS:

1. Health and Safety Code, Chapter 6.5, Section 25200.5(c); Interim Status Document, Section II, Part 1(d): The O'Brien Corporation failed to maintain a continuous base and crack free berm in the container storage area.

2. California Administrative Code, Title 22, Section 67241; Interim Status Document, Section XI, Part 1: The O'Brien Corporation has stored hazardous waste in containers which are dented and deteriorated.

DISCUSSION WITH MANAGEMENT:

Violative conditions were discussed with facility management. Mr. Mazzone stated the facility intends to coat the storage area base with a product developed by O'Brien. Dented, severely rusted containers would be overpacked. Documents clarifying points in question on the facility's waste analysis plan and training plan will be submitted to the Department for review.

ATTACHMENTS:

ISD checklist
generator checklist
photos
DOHS' March 18, 1987 letter to O'Brien Corporation

450 E. Grand
SF
March 19, 1987

↑ Photo 1: Dented, rusted containers of hazardous wastes

3-19-87

P-1: rusted drums containing hazardous waste

P-1: Same as photo 1.

photo 2:

Dented, rusty containers of hazardous wastes, same as P-2

450 E. Grand
SF
March 19, 1987

3-19-87

O'Brien Corp

P-2 rusted, dented drums containing hazardous waste

3-19-87

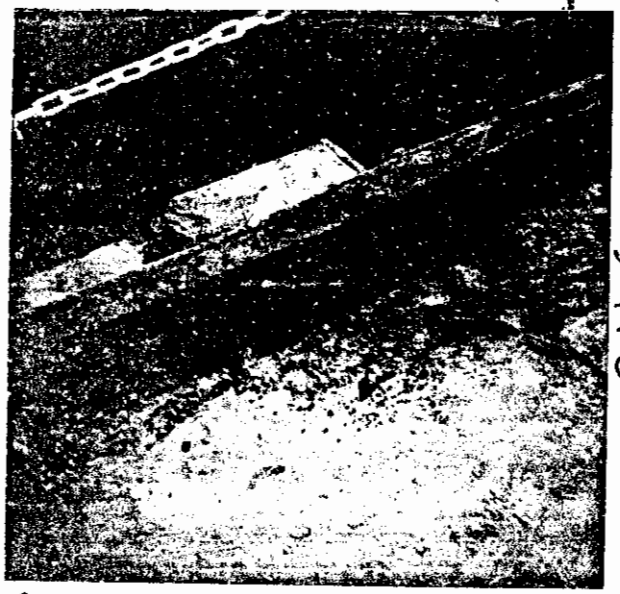
O'Brien Corp

P-3 rusted, dented drums containing hazardous waste same as photo 2

Photo 3. rusted, dented containers of hazardous waste. Same as P-2.

450 E. Grand
SF
March 19, 1987

Photo 4
Southeastern edge of beam and cement flooring of hazardous waste storage area.
Note ① cracked beam
② hole in cement flooring
③ crack in cement flooring



2-19-87

O'Brien Corp.
P-4 : Same as Photo3

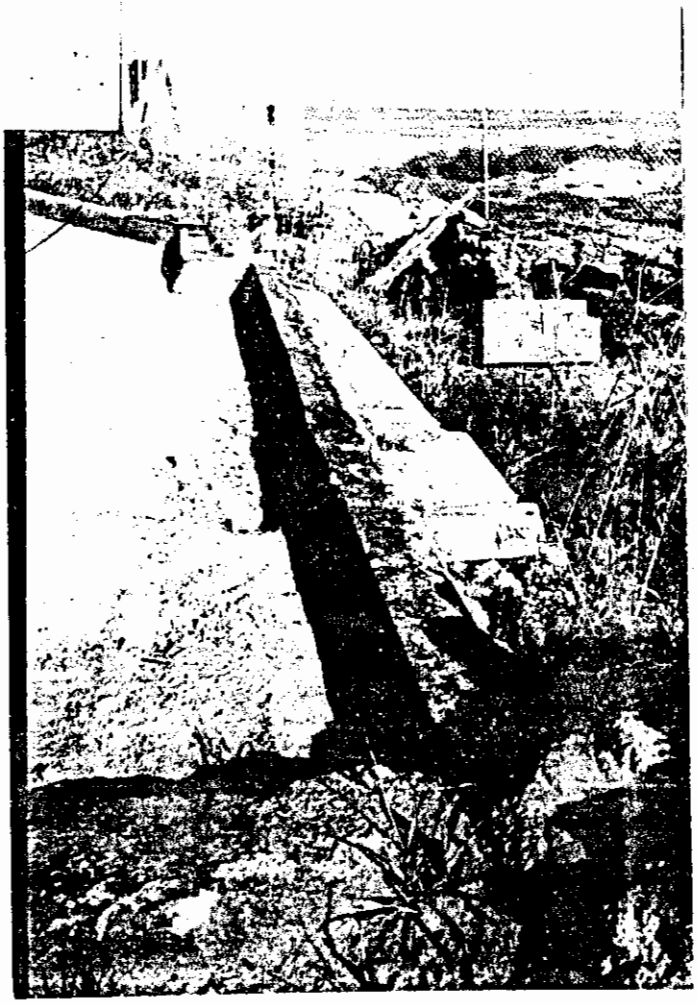
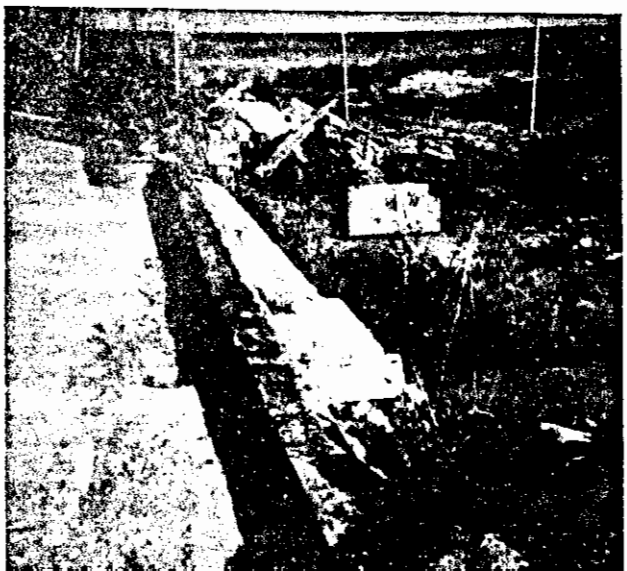
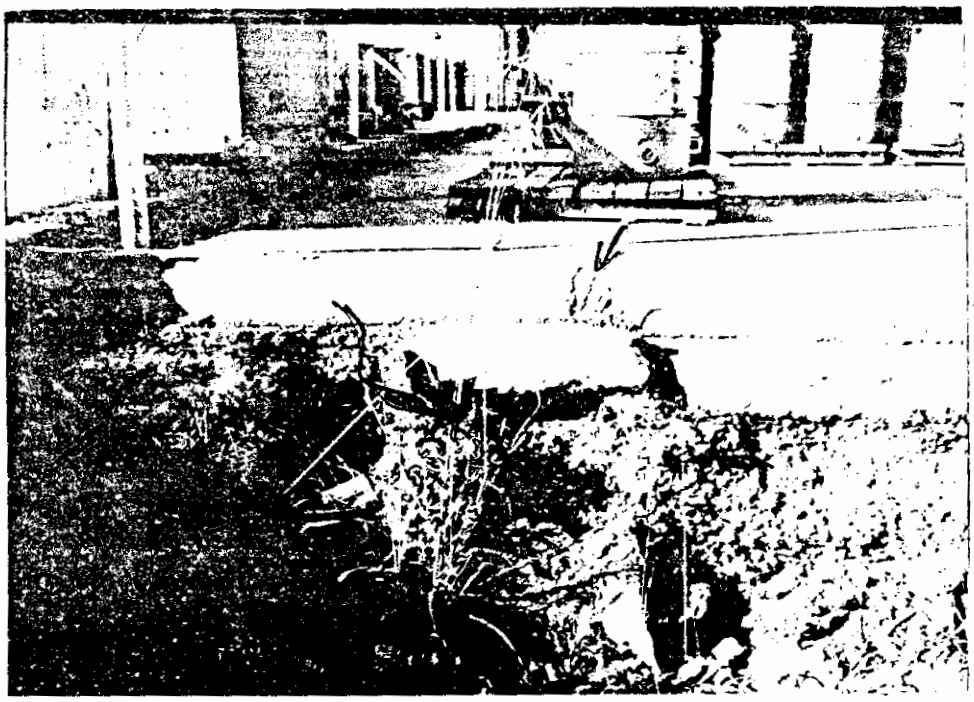


Photo 5:
Cracked beam and hole in cement flooring at the S.E edge of the O'Brien hazardous waste storage area.



O'Brien Corporation
150 E. Grand
S.F.
March 19, 1987



← photo 6

cracked berm at

Southern edge of the hazardous waste storage area.

Soil below berm and foundation is eroding.

3-19-87

O'Brien Corp

2

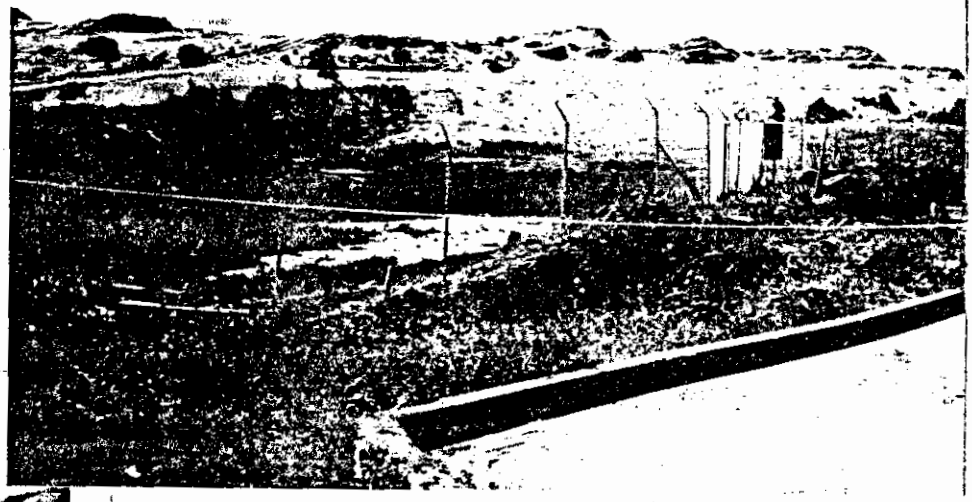
broken berm. soil eroding under berm.

Same as photo 6.

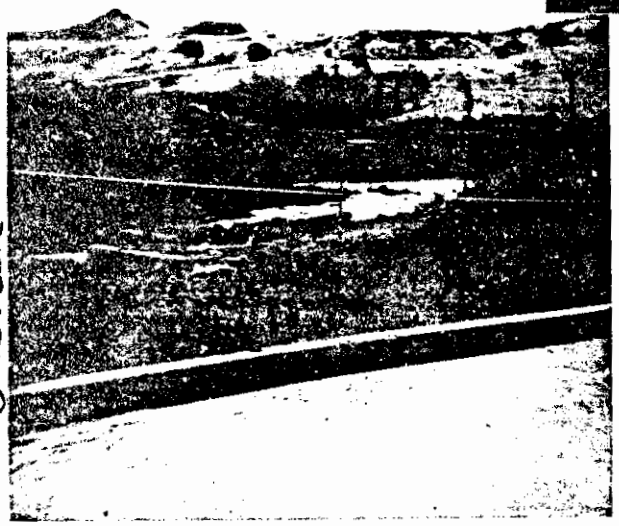
450 E. Grand
SF
March 19, 1987

← photo 7
fence in place at southeast corner of hazardous waste area

photo 8 →
same as 7.



3-19-87



O'Brien

P-7
Fence in place at SE corner of former pond site.

RECORDS SEPARATOR PAGE

RECORDS SEPARATOR PAGE
RECORDS SEPARATOR PAGE
RECORDS SEPARATOR PAGE
RECORDS SEPARATOR PAGE

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY — GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
2151 BERKELEY WAY
BERKELEY, CA 94704

SURVEILLANCE AND COMPLIANCE REPORT
HAZARDUS WASTE GENERATOR

Date of Inspection: 3/19/87

EPA I.D. # CAD005130455

Inspector's Name: Barni / Friedman

Generator Name/Address	Mailing Address	Ownership
O'Brien Corporation	- same -	- same -
450 E Grand Ave		
SSF 94080		

County San Mateo

Contact Person Don Mazzone

Phone # (415) 761-2300

Type of business: paint manufacturing

Persons present:
Patti Barni, Randal Friedman } DOHS/TSCD
Don Mazzone, Phil Berry, Mike Burdine } O'Brien Corp

Samples taken: Yes ___ (receipt attached) No ✓

Avg. Gen. Rate (monthly): 20 drums/mon

Plan of Correction necessary: Yes ___ (Due date: ___________) No ___ Report of violation to be sent.

Discussion with Management:
potential violations
① dented, rusty containers } discussed.
② bare spot in base of container storage at se corners }

comments:
① new flammables - almost within 50 ft of property line
② inspection log - don't mark OK if not OK.

you can go ahead and resurface the container storage with the surfacing material discussed.

Facility operating under ISD? Yes ✓ No ___

On this date an inspection of your facility was conducted under authority of Section 25185, California Health & Safety Code and Section 66328, California Administrative Code. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66328, California Administrative Code. Specific violations of one or more Sections of the California Health & Safety Code, Division 20; California Administrative Code, Title 22; or Code of Federal Regulations, Part 40 are noted on the attached document. These violations relate to the generation, storage, handling, transportation, and/or disposal of hazardous and extremely hazardous waste.

Authorized Representative of Firm*
Name DON L. MAZZONE
Title DIRECTOR OF MANUFACTURING
Signature D. L. Mazzone
Date 3/19/87

Authorized State Agent
Name Patricia Barni
Signature Patricia Barni
Date 3/19/87

*Signature of firm representative signifies receipt of copy of this form

5-1h

Generator Checklist

Hazardous Waste Facility

Yes	No	N/A	
			Under CSD If generator accumulates hazardous waste for more than 90 days, he is subject to Articles 17 through 32 as a storage facility unless he has been granted an extension by the Department. (40 CFR 262.34(a)(1),(b) (66508 (b), CAC.) 25123.3 H&SC
---	---	✓	Generator does not treat waste onsite without a permit (66371 (a)) (25123.5 H&SC) (40 CFR 264.1 (g)(3))
✓	---	---	Generator does not dispose of waste onsite without a permit (66371(a) and (c)(1) CAC) (refer:25113 H&SC) (40 CFR 264.1 (g)(3))
✓	---	---	Generator does not accept waste from offsite without a permit. (66371 (a) CAC.) (40 CFR 264.1 (g)(3))

EPA Identification Number

Yes	No	N/A	
---	---	---	Generator has applied for and received an Environmental Protection Agency identification number (EPA ID No.) and does not treat, store or dispose of, transport or offer for transportation hazardous waste without having an EPA ID No. (66472 (a) and (d), CAC.) (40 CFR 262.12(a))
✓	---	---	Generator does not offer hazardous waste to transporters or to treatment, storage, and disposal (TSD) facilities that do not have an EPA ID No. (66472 (c), CAC.) (40 CFR 262.12(c))

Hazardous Waste Determination

Yes	No	N/A	
✓	---	---	Generator has determined if waste generated is hazardous. (66471, California Administrative Code (CAC).) (40 CFR 262.11)

Recordkeeping and Reporting

Yes	No	N/A	
✓	---	---	Generator has retained records of any test results, waste analyses, or other determinations for at least three years. (66492 (c), CAC.) (40 CFR 262.40(c))
---	---	---	Generator has prepared and submitted to the Department a Biennial Report by March 1 of each even-numbered year, which covers generator activities during the previous calendar year and includes the following information:
---	---	---	Generator's EPA ID No., name, and address. (66493 (a) (1), CAC.) (40 CFR 262.41 (a)(1))
---	---	---	Calendar years covered by report. (66493 (a) (2), CAC.) (40 CFR 262.41 (a)(2))
---	---	---	EPA ID No., name, and address for each off-site TSD facility and/or foreign facility to which waste was shipped. (66493 (a) (3), CAC.) (40 CFR 262.41 (a)(3))
---	---	---	Each transporter's name and EPA ID No. (66493 (a) (4), CAC.) (40 CFR 262.41 (a)(4))
---	---	---	Description, California hazardous waste category number, Department of Transportation (DOT) hazard class, and quantity of each waste shipped. (66493 (a) (5), CAC.) (40 CFR 262.41 (a)(5))
---	---	---	Certification signed by generator/authorized representative. (66493 (a) (6), CAC.) (40 CFR 262.41) (40 CFR 262.42 (a)(6))
✓	---	---	Generator retains a copy of each Biennial Report and Exception Report for at least three years. (66492 (b), CAC.) (40 CFR 262.40 (b))
✓	---	---	Generator has submitted an Annual Report to Board of Equalization. (25342 H&SC)

Manifest

Yes	No	N/A	
---	✓	---	Facility does not produce more than 100 kilograms of hazardous waste in any month.
---	---	✓	Facility transports less than five gallons or 50 pounds of hazardous wastes.
✓	---	---	Hazardous wastes are transported in closed containers and packed in a manner that prevents the containers from tipping, spilling or breaking during transportation.
✓	---	---	Different hazardous wastes are not mixed during transportation.
---	✓	---	Person transporting wastes is the producer of the hazardous wastes.

Note: If answers are yes to all of the five questions above, the facility is not required to transport wastes with a manifest. (Section 25163 (c) H&SC)

✓	---	---	Generator prepares a manifest prior to transporting waste off site. (66480 (a), CAC.) (40 CFR 262.20(a))
✓	---	---	All applicable sections of each manifest are accurately, completely, and legibly filled out. (66481 (b), CAC.) (40 CFR 262.23)

Manifest contains the required information:

Yes	No	N/A	
✓	---	---	Manifest document number. (Section 66482 (a) (1), CAC.) (40 CFR 262 Appendix)
✓	---	---	Generator's name, mailing address, telephone number, and EPA ID No. (Section 66482 (a) (2), CAC.) (40 CFR 262 Appendix)
✓	---	---	Name, address, and EPA ID No. of a designated TSDF, and if desired, one alternate TSDF (66840 (b),(c); 66482 (a)(4) CAC) (40 CFR 262.20(b) and Appendix)
✓	---	---	DOT description of waste. (66482 (a)

(5), CAC.) (40 CFR 262 Appendix)

--- --- --- Total quantity of waste, type, and number of containers. (Section 66482 (a) (6), CAC.) (40 CFR 262 Appendix)

--- --- --- Name and EPA ID No. of transporter. (Section 66482 (a) (3), CAC.) (40 CFR 262 Appendix)

--- --- --- The generator has completed the generator and waste section and signed the manifest certification. (66484(a) (1), CAC) (40 CFR 262.23(a)(1))

--- --- --- The generator has obtained the handwritten signature of the initial transporter and date of acceptance on the manifest. (66484(a)(2), CAC) (40 CFR 262.23(a)(2))

--- --- --- The generator has retained two copies of the manifest, one of which is submitted to the Department. (Section 66484(a) (3), CAC)

--- --- --- The generator has given the transporter the remaining copies of the manifest. (66484(b) CAC) (40 CFR 262.23 (b))

--- --- --- For shipments of hazardous waste within the United States solely by water (bulk shipments only), the generator has sent three copies of the manifest dated and signed in accordance with this section to the owner or operator of the designated facility or the last water (bulk shipment) transporter to handle the waste in the United States if exported by water. (66484 (c)) (40 CFR 262.23 (c))

For rail shipments of hazardous waste within the United States which originate at the site of generation, the generator has sent at least three copies of the manifest dated and signed to:

--- --- --- The next non-rail transporter, if any; (66484 (d)(1), CAC) (40 CFR 262.23 (d)(1)) or

--- --- --- The designated facility if transported solely by rail; (66484(d)(2), CAC) (40 CFR 262.23 (d)(2))

--- --- --- The last rail transporter to handle the waste

in the United States if exported by rail. (25160 (b) H&SC) (66484(d)(3), CAC) (40 CFR 262.23 (d)(3))

--- --- ✓ The generator of hazardous waste has submitted to the Department within 30 days of shipment a legible copy of each manifest used. (25160 H&SC) (65484 (f), CAC)

✓ --- --- Generator determines the status of waste if the TSD copy of manifest is not received 35 days after shipment. (66484 (g), CAC.) (40 CFR 262.42 (a))

--- --- ✓ Generator submits an Exception Report if TSD copy of manifest is not received within 45 days of shipment. (66484 (g), CAC.) (40 CFR 262.42(b))

✓ --- --- Generator keeps a copy of each manifest three years from the date the waste was accepted by the initial transporter. (66492 (a), CAC) (40 CFR 262.40 (a))

International Shipments

Yes	No	N/A	
---	---	✓	When shipping hazardous wastes outside the United States, the generator has sent written notification to EPA Administrator and the Department four weeks in advance of waste exportation. (66515(b) (40 CFR 262.50(b)(1))
---	---	✓	When exporting hazardous wastes, the generator has obtained signature of foreign consignee confirming delivery. 66515(b) (40 CFR 262.50 (b)(2))
---	---	✓	When exporting hazardous wastes, the generator has met manifest requirements for hazardous waste exportation/importation. 66515(b) (40 CFR 262.20 et seq. 262.50(b)(3))

Contingency Plan

Yes	No	N/A	
✓	---	---	Generator has a contingency plan. (67140 (a), CAC) (40 CFR 265.51)
✓	---	---	Owner/operator has made arrangements with

local emergency response agencies to familiarize them with the facility layout and operations and the nature of potential hazards or injuries; any refusal by State or local authorities to enter into any agreements have been documented by owner/operator. (67126, CAC.) (40 CFR 265.37)

--- --- --- The contingency plan describes the actions facility personnel must take in response to emergencies. (67141 (a), CAC.) (40 CFR 265.51)

--- --- --- The plan describes arrangements with local agencies, hospitals, and contractors. (67141 (c), CAC.) (40 CFR 265.51) (Also see 67126 under Preparedness and prevention.

--- --- --- The plan lists names, addresses, and phone numbers of emergency coordinators. (67141 (d), CAC.) (40 CFR 265.52)

--- --- --- The plan includes a list of all emergency equipment including the locations, description, and capabilities of each item. (67141 (e), CAC.) (40 CFR 265.52 (e))

--- --- --- The plan contains evacuation procedures and routes. (67141 (f), CAC.) (40 CFR 265.52(f))

--- --- --- Copies of the contingency plan are maintained at the facility and distributed to local emergency response agencies. (67142, CAC.) (40 CFR 265.53)

--- --- --- The emergency coordinator is thoroughly familiar with the facility, it's operation plan, and contingency plan, and has the authority to commit the resources needed to carry out the contingency plan. (67144, CAC.) (40 CFR 265.55)

--- --- --- Contingency plan is amended whenever necessary. (67143 CAC) (40 CFR 265.54)

Emergency Procedures

YES NO N/A

Contingency Plan ~~not~~ has never been implemented, but includes all the following

--- --- --- If an actual emergency has occurred: the emergency coordinator has activated alarm/communications system and notified

appropriate State and local authorities. (67145 (a) CAC) (40 CFR 265.56(a))

✓ --- --- --- If an actual emergency has occurred: the emergency coordinator has identified character, exact source, amount, and extent of the emergency. (67145 (b) CAC) (40 CFR 265.56(b))

✓ --- --- --- If an actual emergency has occurred: the emergency coordinator has determined the health and environmental hazards and notified appropriate government officials. (67145 (c),(d), CAC (40 CFR 265.56(c))

✓ --- --- --- If an actual emergency has occurred: the emergency coordinator has taken all reasonable measures necessary to prevent the hazard from spreading or recurring. (67145 (e) CAC) (40 CFR 265.56(e))

✓ --- --- --- If an actual emergency has occurred: equipment stopped during emergency is monitored for leaks, pressure, gas generation or damage. (67145 (f) CAC) (40 CFR 265.56(f))

✓ --- --- --- If an actual emergency has occurred: released waste and contaminated equipment is properly treated, stored, disposed. (67145 (g) CAC) (40 CFR 265.56 (g))

✓ --- --- --- If an actual emergency has occurred: contaminated emergency equipment is cleaned and incompatibles kept separate. (67145 (h) CAC) (40 CFR 265.56 (h))

✓ --- --- --- If an actual emergency has occurred: State is notified after emergency, that site is in compliance with 265.56(h) 67145 (i) CAC (40 CFR 265.56 (i))

✓ --- --- --- If an actual emergency has occurred: owner/operator logs all appropriate data (from emergencies) in operating record and submit report to State within 15 days of accident. 67145 (j) (40 CFR 265.56 (j))

Extremely Hazardous Wastes

Yes	No	N/A	
✓	---	---	No extremely hazardous waste is handled

or disposed of without a permit (66570 (a) CAC)

--- --- Generator does not dispose of a waste that may be considered to be an extremely hazardous waste without first obtaining the necessary permit. (66570 (b) CAC)

--- --- Facility does not deviate from methods approved by the Department for handling or disposal of an extremely hazardous waste without the written permission of the department. (66570(d) CAC)

--- --- Hazardous waste is disposed of only at a facility permitted by the department (25189.5 H & SC)

Training

Yes	No	N/A	
---	---	---	Facility personnel successfully complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. (67105 (a) CAC) (40 CFR 265.16(a)
---	---	---	The facility training program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems. (67105 (a), CAC.) (40 CFR 265.16(a))
---	---	---	Facility personnel complete training program within six months after employment or assignment date and do not work in unsupervised positions without completing training. (67105 (b), CAC.) (40 CFR 265.16(b))
---	---	---	Facility personnel shall take part in an annual review of training. (67105 (c), CAC.) (40 CFR 265.16(c))

Facility owner/operator shall maintain the following documents and records at facility:

---	---	---	The job title and name of employee for each

position related to hazardous waste management. (67105 (d) (1), CAC) (40 CFR 265.16(d)(1))

--- --- --- A written description of each position; (67105 (d)(2), CAC.) (40 CFR 265.16(d)(2))

--- --- --- A written training plan for each position; and (67105 (d)(3), CAC.) (40 CFR 265.16(d)(3))

--- --- --- Records documenting that training requirements have been met. (67105 (d)(4), CAC.) (40 CFR 265.16(d)(4))

--- --- --- Training records are maintained until closure of facility (for current employees) or for at least three years (for former employees). (67105 (e), CAC.) (40 CFR 265(e))

Preparedness and Prevention

The facility has:

Yes	No	N/A	
---	---	---	An internal communications or alarm system; (67121 (a), CAC) (40 CFR 265.32)
---	---	---	A two-way communication device for summoning emergency assistance; (67121(b), CAC) (40 CFR 265.32)
---	---	---	Fire control, spill control, and decontamination system (67121(c), CAC) (40 CFR 265.32)
---	---	---	Water at adequate volume and pressure for foam-producing equipment. (67121(d), CAC.) (40 CFR 265.32)
---	---	---	All emergency systems and equipment are properly tested and maintained. (67122, CAC.) (40 CFR 265.33)
---	---	---	All personnel handling hazardous wastes have immediate access to communications or alarms systems. (67123, CAC.) (40 CFR 265.34)
---	---	---	Owner/operator maintains adequate aisle

space to allow the unobstructed movement of personnel and equipment in an emergency. (66124, CAC.) (40 CFR 265.35)

--- --- --- Facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned, sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. (67120a, CAC)

--- --- N/a If in 100-year floodplain or within the maximum high tide the facility is designed, constructed, operated and maintained to prevent washout of any hazardous waste by a 100-year flood, unless the owner or operator can demonstrate to the Department satisfaction that procedures are in effect which will cause the waste to be removed safely, before flood water can reach the facility, to a location where the wastes will not be vulnerable to flood waters. (67120 b CAC).

Closed Facility

--- --- --- If the facility has been closed all hazardous wastes and hazardous waste residues have been removed from tanks, discharge control equipment, discharge confinement structures and containment system. Remaining containers, liners, bases and soils containing, or contaminated with, hazardous waste or hazardous waste residues have been decontaminated or removed. (67260 CAC)

Use and Management of Containers

Yes	No	N/A	
---	---	---	The owner/operator uses a container that is compatible with the waste to be stored. (67242, CAC.) (40 CFR 265.172)
---	---	---	The owner/operator inspects container storage areas at least weekly. (67244, CAC.) (40 CFR 265.174)
---	---	---	Incompatible wastes are not placed in the same containers. (67247 (a) CAC.) (40 CFR 265.177)

waste is not placed in an unwashed

container that previously held an incompatible waste or material. (67247 (b) CAC.) (40 CFR 265.177)

--- --- --- Hazardous waste is in containers which are in good condition or managed in some other way that complies with the requirements of Article 24. (67241 CAC) (40 CFR 265.171)

--- --- --- Containers holding hazardous waste are closed during storage, except when it is necessary to add or remove waste. (67243 (a) CAC). (40 CFR 265.173(a))

--- --- --- Containers holding hazardous waste are not opened, handled or stored in a manner which may rupture the container or cause it to leak. (67243 (b) CAC). (40 CFR 265.173(b))

--- --- --- Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line. (67246 CAC). (40 CFR 265.176)

one row of flammables ~ 48ft from fence (approx. spacing) will move

Pre-transport

Yes No N/A

Before transporting or offering hazardous waste for transportation off site, the generator:

--- --- --- Packages the waste in accordance with the applicable Department of Transportation (D.O.T.) regulations on hazardous materials under 49 CFR Part 173, 178, 179 as amended November 1, 1983. (66504 (d) CAC) (40 CFR 262.30 - .33)

--- --- --- Labels, Placards and marks each package in accordance with applicable D.O.T. regulations on hazardous materials under 48 CFR Part 172 as amended Nov. 1, 1983. (66504 (b)) (40 CFR 262.32(b))

--- --- --- Marks each container of a 110 gallons or less used in such transportation with the following words and information displayed in accordance with the requirements of 49 CFR

172.304 as amended Nov. 1, 1983. (66504 (c) CAC) (40 CFR 262.30 - .33):

> HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
>
> Generator's Name and Address_____.
> Manifest Document Number_____.

Accumulation Time and Labeling

Yes	No	N/A	
---	---	---	Generator accumulates hazardous waste on site for 90 days or less. (66508 (a) CAC) (40 CFR 262.34 (a))
---	---	---	If unforeseen, temporary and uncontrollable circumstances cause hazardous wastes to remain on site longer than 90 days, generator obtains an extension from the Department of Health Services. (66508 (b) CAC) (40 CFR 262.34 (b))
---	---	---	Date each period of accumulation begins is clearly marked and visible for inspection on each container. (Section 66508 (a) (2), CAC.) (40 CFR 262.34(a)(2))
---	---	---	Each container or tank is labeled or marked clearly with "Hazardous Waste." (Section 66508 (a) (3), CAC.) (40 CFR 262.34(a)(3))
---	---	---	Labels are maintained on all nonstationary containers in which hazardous wastes are stored. Labels shall include:
---	---	---	Composition and physical state of the waste, (66508 (c)(1) CAC)
---	---	---	Statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.) and (66508 (c)(2) CAC)
---	---	---	Name and address of the person producing the waste. (66508 (c)(3) CAC.)

Tanks

Yes	No	N/A	
---	---	---	Hazardous waste or treatment reagents are not placed in a tank if they could shorten the intended service life of tank. (67257 (b) CAC) (40 CFR 265.192(b))
---	---	---	Volume of waste in single non-portable tank does not exceed 5000 gallons or 45,000 lbs unless generator has a Permit. (25123.3 (a)(2) H&SC)
---	---	---	Uncovered tanks are operated to ensure at least 60 cm. (2 ft.) of freeboard unless tank has appropriate containment structures that equals or exceeds the freeboard volume. (67257 (c) CAC) (40 CFR 265.192(c))
---	---	---	The owner/operator inspects, at least weekly, tank and discharge control equipment to detect corrosion, leaking or deterioration. (Section 67259 (a) (4) and (5) CAC) (40 CFR 265.194(a)(4)(5)
---	---	---	The owner/operator inspects daily the discharge control equipment, monitoring data and level of waste in open tanks. (67259(a) (1,2,3) (40 CFR 265.194(a)(1), (2)(3))
---	---	---	The owner/operator conducts waste analyses, trial treatment or storage tests, or obtains written information of similar operations when tanks are used to: (1) Chemically treat or store a hazardous waste which is substantially different from waste previously treated or stored in that tank; or (2) Chemically treat hazardous waste with a substantially different process than any previously used in that tank. (67258 CAC) (40 CFR 265.193)
---	---	---	Ignitable or reactive wastes are not placed in a tank unless precautions are taken to prevent reactions. (67261(a) CAC) also refer to 67106 (b). (40 CFR 265.198(a))
---	---	---	Incompatible wastes are not placed in the same tanks. (67262(a) CAC) (40 CFR 265.199)

---	---	---	Owner/operator complies with buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the National Fire Protection Association's (NFPA) "Flammable and Combustable Liquids Code" (1981). (67261 (b), CAC) (40 CFR 265.198(b))
---	---	---	Waste is treated or stored in such a way that it is protected from any material or conditions which may cause the waste to ignite or react. (67261 (b) (2) CAC) (40 CFR 265.198(a)(2))
---	---	---	Incompatible wastes or incompatible wastes and materials are not placed in the same tank unless precautions to prevent reactions as specified in Section 67106 (b) are complied with. (67262(a) CAC) (40 CFR 265.199(a))
---	---	---	Hazardous waste are not placed in an unwashed tank which previously held an incompatible waste or material unless precautions to prevent reactions as specified in Section 67106 (b) are taken. (67262(b) CAC) (40 CFR 265.199(b))
---	---	---	Tanks containing hazardous waste are clearly labeled with the words "Hazardous Waste." (Section 66508 (a)(3) CAC) 40 CFR 262.34(a)(3))

INSPECTION CHECKLIST

TOXIC SUBSTANCES CONTROL DIVISION
DEPARTMENT OF HEALTH SERVICES

☐ Annual Evaluation Inspection

☒ Closing Facility Inspection (Fill in questions marked "C") pond / tank closure

☐ _____

Facility Name: O'Brien Corporation

Street: 450 E Grand

City: S.S.F State: CA ZIP Code: 94080

EPA ID Number: CAD005130455

Report Number:

Date of Investigation: March 19, 1987

EPA Inspector(s): Ø

State Inspector(s): Patti Barni
Randal Friedman

Facility Representative(s): Don Mazzone
Phil Berry
Mike Burdine

Report Prepared By: P. Barni

Form A -- Interim Status Standards for Facilities
That Treat, Store, or Dispose of Hazardous Waste

I. General Information

A. Name: O'Brien Corporation

Street: 450 E. Grand

City: SSF State: CA ZIP Code: 94080

B. Owner: — Same —

Street:

City: State: ZIP Code:

C. Site Activity:

✓ Generation: Complete Form B

___ Transportation: Complete Form C

___ Small Quantity Operator: Complete Form D

___ Recycler: Complete Form E

	Storage
✓	Container (S01)
✓	Tank (S02) → going thru closure
___	Waste Pile (S03)
✓	Surface Impoundment (S04) going thru closure

	Disposal
___	Injection Well (D79)
___	Landfill (D80)
___	Land Application (D81)
___	Ocean Disposal (D82)
___	Surface Impoundment (D83)

	Treatment	Process Code	Design Capacity
✓	Tank (T01) → going thru closure	T01	5,000 (?)
___	Surface Impoundment (T02)		
___	Incinerator (T03)		
___	Other (T04)		

I. General Information (Continued)

E. Business

paint manufacturing

E. Description of Facility Processes

see attached surveillance / compliance report

1. General Information (Continued)

[illegible] Attachments

as attached report

Interim Status
(Part 270, Subpart G)

Office

	Yes	No	Comments
A. Qualifying For Interim Status			
1. For the existing facility to be treated as having been issued a permit, the facility must have:			
a. Submitted a notification of hazardous waste activity (270.70a.2).	✓		
b. Submitted Part A of the permit application (270.70a.2).	✓		
c. Achieved compliance with RCRA interim status standards (270.70b).	✓		
B. Operating During Interim Status			
1. Has the facility complied with the following restrictions:			
a. Has only treated, stored, or disposed of hazardous waste specified in Part A (270.71a.1).	✓		
b. Has only employed processes specified in Part A (270.71a.3).	✓		
c. Has not exceeded design capacities specified in Part A (270.71a.3).	✓		Total tank capacity identified as 60,000. tanks onsite only held a total of ± 30,000 gal. D. Mazzone could not account for the 30,000 gal. He thinks process tanks

Interim Status (Continued)
(Part 270, Subpart G)

Field		Office		
Yes	No	Yes	No	Comments
C. Changes During Interim Status				
1. Has a revised Part A been submitted prior to the following changes:				→ n/a
a. Treatment, storage, and disposal of hazardous waste not previously identified in Part A (270.72a).			N/A	
b. Increases in design capacity of processes (270.72b).				
c. Changes in or additions to processes (270.72c).				
d. Change in ownership (270.72d).				
2. Have the changes made not amounted to reconstruction (270.72e)?				

Preparedness and Prevention
(Part 265, Subpart C)

Facility

Office

Y	N		Yes	No	Comments
		C. Required Equipment			
		1. Does the facility have the following equipment where applicable:			
/		a. Internal communications or alarm systems (265.32a).			
C					
		b. Telephone or two-way radios at the scene of operation (265.32b).			
/					
C					
		c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control; and decontamination equipment (265.32c).			
/					
C					
		d. Water at adequate volume and pressure or foam-producing equipment or automatic sprinklers (265.32d).			
/					
C					
		D. Access to Communications or Alarm Systems			
		1. Do personnel in areas where hazardous waste is being handled have immediate access to these systems (265.34)?			
/					

III. Safety, Equipment, and Emergency Procedures

General Facility Standards
(Part 265, Subpart B)

Field		Office		
Yes	No	Yes	No	Comments
A. Required Notices				
1. Has the RA been notified regarding the receipt of hazardous waste from a foreign source (265.12a)?		N/A		
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?				
B. General Waste Analysis				
1. Has the facility obtained a detailed chemical and physical analysis of each hazardous waste (265.13a.1)?		✓		
2. Does the analysis contain all information that must be known to properly treat, store, or dispose of the hazardous waste (265.13a.1)?		✓		
3. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?		✓		
4. Is the analysis repeated when there is a change in the process (265.13a.3)?		✓		

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265, Subpart B)

		Office		
		Yes	No	Comments
5.	For off-site facilities, is the analysis repeated when the hazardous waste received does not match the hazardous waste designated on the manifest (265.13a.3)?	n/a		
6.	For off-site facilities, does the facility inspect or analyze each movement of hazardous waste to verify that the hazardous waste received matches the identity of the hazardous waste specified on the manifest (265.13a.4)?	n/a		
7.	Does the facility have a detailed waste analysis plan (265.13b)?	✓		
8.	Does the facility follow the procedures specified in the waste analysis plan (265.13b)?			
9.	Does the waste analysis plan contain the following elements:			
	a. Parameters of analysis of each hazardous waste handled (265.13b.1).	✓		
	b. Rationale for the selection of each parameter (265.13b.2).	✓		

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265, Subpart B)

F...			Office		
Yes	No		Yes	No	Comments
		c. Test methods used to obtain a representative sample of hazardous waste (265.13b.3).	✓		
		d. Frequency which each analysis will be repeated (265.13b.4).	✓		contract [illegible]
		e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5).			n/a
		10. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of hazardous waste (265.13c)?			n/a
		11. For off-site facilities, does the plan contain the following elements:			
		a. Description of procedures used to identify each movement of hazardous waste (265.13c.1).			
		b. Description of the sampling method used to obtain a representative sample of the hazardous waste (265.13c.2).			

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265, Subpart B)

Field		Office		
Yes	No	Yes	No	Comments
C. Security				
1. Do security measures include:				
✓ C				
a. 24-hour surveillance (265.14b.1).				
✓ C				
b. Artificial or natural barriers and controlled entry (265.14b.2).				
✓ C				
c. Signs with the legend "Danger -- Unauthorized Personnel Keep Out" posted at entrances to active portions of the facility (265.14c).				
D. General Inspection Requirements				
1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and hazardous waste discharges (265.14a)?		✓ C		
2. Does the facility follow a written inspection schedule (265.15b.1)?		✓ C		
3. Is the schedule kept at this facility (265.15b.2)?		✓ C		
4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration, or discharges of all (265.15b.3):				

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265, Subpart B)

Field		Office		
Yes	No	Yes	No	Comments
	a. Monitoring equipment.	✓ C	—	
	b. Safety and emergency equipment.	✓ C	—	
	c. Security equipment.	— C	—	
	d. Operating and structural equipment.	✓ C	—	
	5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)?	✓ C	—	
	6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)?	✓ C	—	
— C —	7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)?	✓		
	8. Are inspections recorded in an inspection log (265.15d)?	✓ C	—	
	9. Does the log include (265.15d):			
	a. Date and time of inspection.	✓ C	—	
	b. Name of inspector.	✓ C	—	
	c. Observations recorded.	✓ C	—	

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265, Subpart B)

Field Yes	Field No		Office Yes	Office No	Comments
		d. Date and nature of repairs or other remedial actions.	✓ C	—	
		10. Are inspection records kept for at least three years (265.15d)?	✓ C	—	
		E. Personnel Training			
		1. Does the facility have a personnel training program (265.16a.1)?	✓ C	—	
		2. Is it directed by a person trained in hazardous waste management procedures (265.16a.2)?	✓ C	—	[illegible]
		3. Does the program include training in (265.16a.3)?	✓ C	—	
		a. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.	✓ C	—	
		b. Emergency procedures, including contingency plan implementation.	✓ C	—	
		4. Do new personnel receive required training within six months (265.16b)?	n/a C	—	[illegible]
		5. Do personnel take part in an annual review of the initial training (265.16c)?	✓ C	—	[illegible]

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265, Subpart B)

Title			Office		
Yes	No		Yes	No	Comments
		6. Do personnel training records include (265.16d):			
		a. Job titles.	✓		
		b. Job descriptions.	✓C		
		c. Descriptions of training.	✓		
		d. Records of training.	✓C		
C			C		
		F. Requirements For Ignitable, Reactive, or Incompatible Wastes			
		1. Are the following precautions taken to prevent accidental ignition or reaction (265.17a):			
✓C		a. Separation and protection from ignition sources.			
✓C		b. No smoking signs in hazard areas.			
		2. Is the treatment, storage, and disposal of ignitable, reactive, and incompatible waste conducted so that it does not (265.17b):			
✓		a. Generate extreme heat or pressure, fire or explosion, or violent reaction.			

III. Safety, Equipment, and Emergency Procedures (Continued)

General Facility Standards
(Part 265. Subpart B)

		Office		
		Yes	No	Comments
	b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases.	✓		
	c. Damage structural integrity of hazardous waste containment devices.	✓		
	d. Threaten human health or the environment.	✓		

III. Safety, Equipment, and Emergency Procedures (Continued)

Preparedness and Prevention
(Part 265, Subpart C)

Field		Office		
Yes	No	Yes	No	Comments
✓ C				
A. Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment (265.31)?				
B. Testing and Maintenance of Equipment				
✓ C				
1. Does the facility test and maintain emergency equipment in operable condition (265.33)?				
C. Required Aisle Space				
✓ C				
1. Is there adequate aisle space for unobstructed movement of fire, spill control, and decontaminant equipment in an emergency (265.35)?				
D. Arrangements With Local Authorities				
1. Has the facility made the following arrangements?				
a. Arrangements to familiarize police, fire department, and emergency response team with hazardous waste operations (265.37a.1).				

III. Safety, Equipment, and Emergency Procedures (Continued)

Preparedness and Prevention
(Part 265, Subpart C)

		Office		
		Yes	No	Comments
b.	Agreements designating primary emergency authority (265.37a.2).	✓		
c.	Agreements with state emergency response teams, contractors, and equipment suppliers (265.37a.3).	✓		
d.	Arrangements to familiarize local hospitals with the properties of hazardous waste and the types of potential injuries and illnesses from exposure to hazardous waste (265.37a.4).	✓		Use Urgent Care
2.	Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements (265.37b)?	✓ C		

III. Safety, Equipment, and Emergency Procedures (Continued)

Contingency Plan and Emergency Procedures
(Part 265, Subpart D)

	Office Yes	No	Comments
A. Does the facility have a contingency plan (265.51a)?	✓ C		
B. Content of Contingency Plan			
1. Does the plan describe actions personnel must take to comply with Sections 265.51 and 265.56 in response to fires, explosions, or unplanned releases of hazardous waste (265.52a)?	✓ C		
2. Does the plan describe arrangements agreed by police, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services pursuant to Section 265.37 (265.52c)?	✓ C		
3. Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators (265.52d)? (List in order of responsibility.)	✓ C		
4. Does the plan list all emergency equipment, including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	✓ C		

III. Safety, Equipment, and Emergency Procedures (Continued)

Contingency Plan and Emergency Procedures
(Part 265, Subpart D)

Field Yes	Field No		Office Yes	Office No	Comments
		5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes, and alternate routes (265.52f)?	✓ C		
		C. Copies of Contingency Plan			
		1. Is the plan maintained at the facility (265.52a)?	✓ C		
		2. Has the plan been submitted to all local emergency organizations (265.53b)?	✓ C		
		D. Amendment of Contingency Plan			
		1. Has the plan been reviewed and immediately amended when required (265.54)?	✓ C		
		E. Emergency Coordinator			
		1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?	✓ C		
		2. Does the coordinator have authority to carry out the contingency plan (265.55)?	✓ C		

III. Safety, Equipment, and Emergency Procedures (Continued)

Contingency Plan and Emergency Procedures
(Part 265, Subpart D)

Field		Office		
Yes	No	Yes	No	Comments
F. Emergency Procedures				
1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in Section 265.56 (265.56)?		/ C		

IV. Record Keeping

Manifest System, Record Keeping, and Reporting (Part 265, Subpart E)

	Office		
	Yes	No	Comments
A. Operating Record			
1. Does the facility maintain an operating record (265.73a)?	✓ C		(ie. previous specifics) due first
2. Does the operating record contain the following information:			
a. A description and the quantity of each waste received (265.73b.1).	✓		
b. The method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I (265.73b.1).	✓		
c. The location of each waste within the facility and the quantity at each location (265.73b.2). (This information must include cross-references to specific manifest numbers.)	✓		
d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2).	n/a		

IV. Record Keeping (Continued)

Manifest System, Record Keeping, and Reporting
(Part 265, Subpart E)

Field			Office		
Yes	No		Yes	No	Comments
		e. Records and results of all waste analysis and trial tests (265.73b.3).	✓ C		
		f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4).	n/a C		never been implemented
		g. Records and results of operator inspections (265.73b.5).	✓ C		
		h. Monitoring data (265.73b.6).	being gathered C		
		i. All closure and postclosure costs as applicable (265.73b.7).	appears to be adequate C		financial resp. will be reviewed by HGTRS.
		B. Availability, Retention, Disposition of Records			
		1. Are all records, including plans, available for inspection (265.74a)?	✓		
		2. Have copies of records of hazardous waste disposal locations and quantities under Section 265.73b been submitted to the RA and local land authority upon closure of the facility (265.74c)?	n/a C		(re dept)

IV. Record Keeping (Continued)

Manifest System, Record Keeping, and Reporting
(Part 265, Subpart E)

	Office Yes	No	Comments
C. Biennial Report*			
1. Has the facility submitted a Biennial report to the RA by March 1 of each even numbered year (265.75)? (Indicate years reviewed.)	✓ C		
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year (265.75)?	✓ C		
3. Does the report include the following information (265.75)?			
a. EPA identification number, name, and address of the facility.	✓ C		
b. Calendar year covered by report.	✓ C		
c. Description and quantity of each hazardous waste received.	✓		
d. Methods of treatment, storage, or disposal for each hazardous waste.	✓ C		
e. Monitoring data under Section 265.94a.2.ii and iii and b.2.	→		

* Required annually under California law. Specify year of report for any violation

IV. Record Keeping (Continued)

Manifest System, Record Keeping, and Reporting (Part 265, Subpart E)

	Field Yes	Field No	Office Yes	Office No	Comments
f. Most recent closure and postclosure cost estimates.			✓ C		$10,000 [illegible]; 50,000 for post closure
g. Required certification.			✓ C		
D. Additional Reports					
1. Has the facility reported to the RA (265.77):					
a. Releases, fires, and explosions.			C		n/a
b. Groundwater contamination and monitoring data.			C		n/a
c. Facility closure.			✓ C		being reported

V. Closure

Closure and Postclosure
(Part 265. Subpart G)

Office

	Yes	No	Comments
A. Closure Plan ⟶ part of order signed 3/11/87 closure for ponds being submitted w/in 45 days of the order's signature			
1. Does the facility have a closure plan (265.112a)?	C		
2. Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)?	C		
3. Do the steps to close in the plan include (265.112a):			
a. Pretreatment of hazardous waste. (ex. S-cyl)	C		
b. Treatment of hazardous waste. (S-stabilization)	C		
c. Removal of hazardous waste from process units.	C		
d. Disposal of hazardous waste.	C		
e. Decontamination of equipment and structures.	C		
f. Scheduled inspections for closure certification purposes.	C		

V. Closure (Continued)

Closure and Postclosure
(Part 265, Subpart G)

		Office		
		Yes	No	Comments
4.	Does the description of how and when the facility will be closed include the following elements:			See previous page
	a. Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1).		C	
	For facilities that have designated hazardous waste management areas inactive prior to November 19, 1980, are records available documenting the cessation of activity or final closure?		C	
	Was a Notification of Hazardous Waste Site submitted to EPA as required by Section 103c of CERCLA?		C	
	b. Estimate of the maximum inventory of hazardous waste in storage and in treatment at any time during the life of the facility (265.112a.2).		C	
	c. Does the inventory include the maximum amount of on-site:			

V. Closure (Continued)

Closure and Postclosure
(Part 265, Subpart G)

	Office Yes	Office No	Comments
Hazardous waste in surface impoundments.	___ C	___	
Hazardous waste in tanks.	___ C	___	
Hazardous waste in piles.	___ C	___	
Hazardous waste in containers.	___ C	___	
Hazardous waste in drainage pits or sumps.	___ C	___	
Contaminated soil from spills or leaks.	___ C	___	
Contaminated soils and liners from non-disposal impoundments.	___ C	___	
Contaminated soils from land treatment fields.	___ C	___	
Decontamination residues.	___ C	___	
Process residues.	___ C	___	
Other (specify).	___ C	___	

d. Decontamination procedures, including (265.112a.3):

V. Closure (Continued)

Closure and Postclosure
(Part 265, Subpart G)

See page 25

Field: Yes	No		Office: Yes	No	Comments
		A list of equipment, containers, and structures requiring decontamination.		C	
		Sampling and analytical methods for determining whether soil contamination or decontamination residues are hazardous waste.		C	
		Testing criteria for determining adequacy of cleanup.		C	
		Methods of treatment or disposal of contaminated soils and residues.		C	
		e. Estimate of the expected year of closure (265.112a.4).		C	
		f. Schedule for final closure activities (265.112a.4).		C	
		g. Does the schedule include:			
		Total time required to close.		C	

Closure and Postclosure
(Part 265, Subpart G)

See page 25

Field Yes No		Office Yes	Office No	Comments
	Time required for interviewing closure activities (e.g., time required for hazardous waste treatment, disposal, decontamination, and certification inspections).	C		
	4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.)	C		
	5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?	C		

B. Time Allowed for Closure

Field Yes No		Office Yes	Office No	Comments
	1. Does the schedule for final closure allow for the following:			
	a. Treatment, removal, or disposal of hazardous waste within 90 days after receipt of final volume of hazardous waste or after approval of closure plan (265.113a).	C		

Closure and Postclosure
(Part 265, Subpart G)

See page 25

Field Yes	Field No		Office Yes	Office No	Comments
		b. Completion of closure plan activities within 180 days after receipt of final volume of hazardous waste or after approval of closure plan (265.113b).		C	
		C. Disposal and Decontamination of Equipment			
		1. For facilities that have completed closure activities, have all equipment and structures been properly disposed of or decontaminated by removing all hazardous waste and contaminated residues (265.114)?		C	
		D. Certification of Closure			
		1. For facilities that have completed closure activities, have a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?		C	
		E. Partial Closure			
		1. Does the facility plan to close discreet regulated hazardous waste management units during the intended operating life?			

Closure and Postclosure
(Part 265, Subpart G)

Field Yes	Field No		Office Yes	Office No	Comments
		If "Yes", complete compliance form for partial closure.			
		F. Partial Closure →	see page 25		
		1. Does the closure plan describe how the facility will be partially closed (265.112a.1)?			
		2. Does the plan describe the size of areas partially closed?			
		3. Does the plan describe the procedures for partial closure?			
		4. Does the plan address maintenance activities, including (265.112a.1)?			
		a. Visual inspections.			
		b. Groundwater monitoring.			
		c. Maintaining cover.			
		d. Maintaining diversion structures.			
		e. Controlling erosion.			
		f. Maintaining vegetation.			
		g. Maintaining site security systems.			
		h. Leachate collection system.			

V. Closure (Continued)

Closure and Postclosure
(Part 265, Subpart G)

see page 25

Field			Office		
Yes	No		Yes	No	Comments
		i. Gas collection system.	—	—	
		j. Other (specify).	—	—	
		5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?	—	—	
		6. Does the plan describe when the facility will be partially closed (265.112a.1)?	—	—	
		7. Does the schedule for partial closure include (265.112a.1):	—	—	
		a. Date(s) of partial closure(s).	—	—	
		b. Total time required for each partial closure.	—	—	
		c. Time required for interviewing partial closure activities (e.g., time required for waste removal, stabilization, treatment, disposal, placement of cover, vegetation, decontamination, and certification).	—	—	

VI. Financial Responsibility

Financial Requirements
(Part 265, Subpart H)

Headquarters not reviewed

Field Yes	Field No	Office Yes	Office No	Comments
A. Cost Estimate for Closure				
1. Has a written estimate been prepared of the cost of closing the facility (265.142a)?		___	___	_____
What is the amount of the closure cost estimate?		___	___	_____
2. Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive (265.142a)?		___	___	_____
3. Does the cost estimate cover all the activities in the closure plan (265.142a)?		___	___	_____
4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.142b)?		___	___	_____
5. Was the adjustment made by using an inflation factor derived from the Annual Implicit Price Deflator for Gross National Product as published by the U. S. Department of Commerce in its "Survey of Current Business" (265.142b)?		___	___	_____

VI. Financial Responsibility (Continued)

Financial Requirements
(Part 265, Subpart H)

Not reviewed

Office

Yes	No	Comments
		Latest annual deflator = _____
		Previous annual deflator = _____
		Inflation factor = _____ (Latest deflator/previous deflator)
		Current cost adjustment = _____ (Latest adjusted estimate x inflation)
		6. Was the cost estimate revised whenever a change in the closure plan increased the cost of closure (265.142c)? (Revised estimate must be adjusted for inflation.)
		7. Are the following kept at the facility during the operating life of the facility (265.142d)?
		a. Latest closure cost estimate.
		b. Contractor estimates and bids.
		c. Figures derived from cost estimating handbooks.
		d. Figures derived from operator experience.
		9. Does the estimate accurately reflect the cost of closure for similar types of facilities?

VIII. Groundwater Monitoring

Groundwater Monitoring
(Part 265, Subpart F)

by RWQCB

Field Office not reviewed

Yes	No		Comments
		A. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented (265.90a)?	
		B. Groundwater Monitoring System	
		1. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area (265.91a.1)?	
		a. Are groundwater samples from the uppermost aquifer representative of background groundwater quality and not affected by the facility (as ensured by proper well number, locations, and depths) (265.91a.1)?	
		2. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste management area (265.91a.2)?	
		a. Do well numbers, locations, and depths ensure prompt detection of any statistically significant	

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

Field			Office See previous page		
Yes	No		Yes	No	Comments
		amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer (265.91a.2)?	___	___	_____
		3. Have the locations of the waste management areas been verified to conform with information in the groundwater program (265.91b)?	___	___	_____
		a. If the facility contains multiple waste management components, is each component adequately monitored (265.91b & b.2)?	___	___	_____
		4. Do the numbers, locations, and depths of the monitoring wells agree with the data in the groundwater monitoring system program (265.91b)?	___	___	_____
		5. Well completion details (265.91c):			
		a. Are wells properly cased?	___	___	_____
		b. Are wells properly screened and packed where necessary to enable sampling at appropriate depths?	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

by RWQCB

Field			Office		
Yes	No		Yes	No	Comments
		c. Are annular spaces properly sealed to prevent contamination of groundwater?	___	___	_____
		C. Sampling and Analysis			
		1. Has a groundwater sampling and analysis plan been developed (265.92a)?	___	___	_____
		a. Has it been followed?	___	___	_____
		b. Is the plan kept at the facility?	___	___	_____
		c. Does the plan include procedures and techniques for:			
		i. Measurement of groundwater surface elevations (265.92a.1).	___	___	_____
		ii. Sample collection (265.92a.1).	___	___	_____
		iii. Sample preservation (265.92a.2).	___	___	_____
		iv. Sample shipment (265.92a.2).	___	___	_____
		v. Analytical procedures (265.92a.3).	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

By RWQCB

Field		Office		
Yes	No	Yes	No	Comments
				vi. Chain of custody control (265.92a.4).
				2. Are the required parameters in groundwater samples being tested quarterly for the first year (265.92b and 265.92c.1)?
				a. Are the groundwater samples analyzed for parameters characterizing the suitability of the groundwater as a drinking water supply* (265.92b.1)?
				b. Are the groundwater samples analyzed for parameters establishing groundwater quality* (265.92b.2)?

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* EPA interim primary drinking water standards: Arsenic; barium; cadmium; chromium; fluoride; lead; mercury; nitrate (as N); selenium; silver; endrin; lindane; methoxychlor; toxaphene, 2-4D; 2,4,5-TP silver; radium; gross alpha; gross beta turbidity; coliform bacteria.

Parameters establishing groundwater quality: Chloride, iron, manganese, phenols sodium, sulfate.

Parameters used as indicators of groundwater contamination: pH, specifi conductance, total organic carbon, total organic halogen.

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

Rw O&B

Field			Office		
Yes	No		Yes	No	Comments
		c. Are the groundwater samples analyzed for parameters used as indicators of groundwater contamination* (265.92b.3)?	___	___	_____
		3. For each indicator parameter, are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring (265.92c.2)?	___	___	_____
		4. Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year (265.92c.2)?	___	___	_____
		5. For facilities which have completed first-year groundwater sampling and analysis requirements:			
		a. Have samples been obtained and analyzed for the groundwater			

* EPA interim primary drinking water standards: Arsenic; barium; cadmium; chromium fluoride; lead; mercury; nitrate (as N); selenium; silver; endrin; lindane methoxychlor; toxaphene, 2-4D; 2,4,5-TP silver; radium; gross alpha; gross beta turbidity; coliform bacteria.

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Office

	Yes	No	Comments
quality parameters at least annually (265.92d.1)?	___	___	_____
b. Have samples been obtained and analyzed for the indicators of groundwater contamination at least semiannually (265.92d.2)?	___	___	_____
6. Were groundwater surface elevations determined at each well each time a sample was taken (265.92e)?	___	___	_____
D. Preparation, Evaluation, and Response			
1. Has an outline of a groundwater quality assessment program been prepared (265.93a)?	___	___	_____
a. Does it describe a program capable of determining:			
i. Whether hazardous waste or hazardous waste constituents have entered the groundwater (265.93a.1).	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Field			Office		
Yes	No		Yes	No	Comments
		ii. The rate and extent of migration of hazardous waste or hazardous waste constituents (265.93a.2).	___	___	_____
		iii. Concentrations of hazardous waste or hazardous waste constituents in groundwater (265.93a.3).	___	___	_____
		2. After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well (265.93b)?	___	___	_____
		a. Were the results compared with the initial background means from the upgradient well(s) determined during the first year (265.93b)?	___	___	_____
		i. Was each well considered individually (265.93b)?	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RW QCB

Field		Office		
Yes	No	Yes	No	Comments

ii. Was the student's t-test used (at the 0.01 level of significance). (265.93b)? ___ ___ _____

b. Was a significant increase (or pH decrease) found in the:

i. Upgradient well. ___ ___ _____

ii. Downgradient wells. ___ ___ _____

If "Yes", complete the Compliance Form for A Facility Which May be Affecting Groundwater Quality.

3. Were the groundwater surface elevations evaluated annually to determine whether the monitoring wells are properly placed (265.93f)? ___ ___ _____

4. If it was determined that modification of the number, location, or depth of monitoring wells was necessary, was the system brought into compliance with 265.91a (265.93f)? ___ ___ _____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Field		Office		
Yes	No	Yes	No	Comments
E. Record Keeping and Reporting				
1. Have records been kept of analyses for parameters in 265.92c and d (265.94a.1)?		___	___	_____
2. Have records been kept of groundwater surface elevations taken at the time of sampling for each well (265.94a.1)?		___	___	_____
3. Have records been kept of required evaluations in 265.93b (265.94a.1)?		___	___	_____
4. Have the following been submitted to the RA (265.94a.2):				
a. Initial background concentrations of parameters listed in 265.92b within 15 days after completing each quarterly analysis required during the first year.		___	___	_____
b. For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?		___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Field		Office		
Yes	No	Yes	No	Comments
				c. Annual reports, including:
				i. Concentrations or values of parameters used as indicators of groundwater contamination for each well along with required evaluations under 265.93b.
				ii. Any significant differences from the initial background values in upgradient wells separately identified.
				iii. Results of the evaluation of groundwater elevations.
				1. Have comparisons of groundwater contamination indicator parameters for the upgradient well(s) shown a significant increase (or pH decrease) over initial background?
				a. If "Yes", has this information been submitted to the RA according to 265.94a.2.ii (265.93c.1)?

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Field			Office		
Yes	No		Yes	No	Comments
		2. Have comparisons of indicator parameters for the downgradient wells shown a significant increase (or pH decrease) over initial background?	___	___	_____
		a. If "Yes", were additional groundwater samples taken for those downgradient wells where the significant differences were determined?	___	___	_____
		i. Were samples split in two?	___	___	_____
		ii. Were the significant differences due to human (e.g., laboratory) error?	___	___	_____
		If "Yes", do not continue.			
		3. If significant differences were not due to error, was a written notice sent to the RA within seven days of confirmation (265.93d.1)?	___	___	_____
		4. Within 15 days of notification to the RA, was a certified groundwater quality assessment plan submitted (265.93d)?	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

Rio QCB

Field		Office		
Yes	No	Yes	No	Comments
5. Does the groundwater quality assessment plan specify (265.93d.3):				
	a. Monitoring well information, including well numbers, locations, and depths.	___	___	_____
	b. Sampling methods.	___	___	_____
	c. Analytical methods.	___	___	_____
	d. Evaluation methods.	___	___	_____
	e. Schedule of implementation.	___	___	_____
6. Does the plan allow for determination of (265.93d.4):				
	a. Rate and extent of migration of hazardous waste or hazardous waste constituents.	___	___	_____
	b. Concentrations of the hazardous waste or hazardous waste constituents.	___	___	_____
7. Is it indicated that the first determination was made as soon as technically feasible (265.93d.5)?		___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

Rev & CB

Field Yes	Field No		Office Yes	Office No	Comments
		a. Within 15 days after the first determination, was a written report containing the assessment of groundwater quality submitted to the RA?			
		8. Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the groundwater?			
		a. If "No", was the original indicator evaluation program required by 265.92 and 265.93b reinstated?			
		b. Was the RA notified of the reinstatement of the program within 15 days of the determination (265.93d.6)?			
		9. If it was determined that hazardous waste or hazardous waste constituents have entered the groundwater (265.93d.7):			
		a. For facilities where the program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis			

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Field			Office		
Yes	No		Yes	No	Comments
		(265.93d.7)? (If the program was implemented during the postclosure care period, determinations made in accordance with the groundwater quality assessment plan may cease after the first determination.	___	___	_____
		b. Were subsequent groundwater quality reports submitted to the RA within 15 days of determination (265.93d.7)?	___	___	_____
		c. Were records kept of the analysis and the evaluations specified in the groundwater quality assessment (throughout the active life of the facility) (265.94b.1)?	___	___	_____
		d. If a disposal facility, were (are) records kept throughout the postclosure period as well (265.94b.1)?	___	___	_____
		10. Are annual reports submitted to the RA containing the results of the groundwater quality assessment program (265.94b.2)?	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Field			Office		
Yes	No		Yes	No	Comments
		a. Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents during the reporting period (265.94b.2)?	___	___	_____
		A. Compliance Form for Demonstraing a Waiver of Interim Status Requirements			
		1. Is a written waiver demonstration kept at the site (265.90c)?	___	___	_____
		2. Is the demonstration certified by a qualified geologist or geotechnical engineer (265.90c)?	___	___	_____
		3. Does the waiver demonstration establish the potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer (265.90c.1)?	___	___	_____
		a. Does the evaluation of a water balance include:			
		i. Precipitation.	___	___	_____
		ii. Evapotranspiration.	___	___	_____
		iii. Runoff.	___	___	_____

Groundwater Monitoring
(Part 265, Subpart F)

RCWQCB

Field			Office		
Yes	No		Yes	No	Comments
		iv. Infiltration (including any liquid in surface impoundments).	___	___	_____
		b. Does the evaluation of the unsaturated zone characteristics include:			
		i. Geologic materials.	___	___	_____
		ii. Physical properties.	___	___	_____
		iii. Depth to groundwater.	___	___	_____
		4. Does the waiver demonstration establish the potential for hazardous waste or hazardous waste constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water (265.90c.2)?	___	___	_____
		a. Does the evaluation of the saturated zone characteristics include:			
		i. Geologic materials.	___	___	_____
		ii. Physical properties.	___	___	_____

VIII. Groundwater Monitoring (Continued)

Groundwater Monitoring
(Part 265, Subpart F)

RWQCB

Facility

Office

		Yes	No	Comments
iii.	Rate of groundwater flow.	___	___	_____
iv.	Proximity of the facility to water supply wells or surface water.	___	___	_____

XIII. Surface Impoundments

Surface Impoundments
(Part 265, Subpart K)

going thru Closure → see closure plan Comments

Field			Office		
Yes	No		Yes	No	Comments
—	—	1. Do impoundments have at least two feet of freeboard (265.222)?			
C					
—	—	2. Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity (265.223)?			
C					
		3. Does the facility conduct waste analysis and trial treatment tests, or have they obtained written documentation on similar operating conditions before the impoundment is is used to:			
		a. Chemically treat a hazardous waste which is substantially different from waste previously treated in the impoundment (265.225a.1).	—	—	
		b. Chemically treat hazardous waste with a substantially different process than was previously used (265.225a.2).	—	—	
		4. Is the treatment of hazardous waste in impoundments conducted so that it does not (265.225a.2):			

XIII. Surface Impoundments (Continued)

Surface Impoundments
(Part 265, Subpart K)

Field			Office		
Yes	No		Yes	No	Comments
		a. Generate extreme heat or pressure, fire or explosion, or violent reaction.			
		b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases.			See closure plan comments
		c. Damage the structural integrity of the liner.			
		d. Threaten human health or the environment.			
		5. Is the freeboard level inspected at least daily (265.226a.1)?		C	
		6. Are the dikes inspected weekly for evidence of leaks, deterioration or failure (265.226a.2)?		C	
		7. At closure, has the facility removed from the impoundments (265.228a):			
		a. Standing liquids.			
		b. Waste and waste residues.			
		c. The liner, if any.			
		d. Underlying and surrounding contaminated soil.			

XIII. Surface Impoundments (Continued)

Surface Impoundments
(Part 265, Subpart K)

Field			Office		
Yes	No		Yes	No	Comments
		8. At closure, has the facility demonstrated under Section 261.3 c and d that none of the materials listed in (7) remaining at any stage of removal are hazardous wastes (265.228b)?			
		9. If the answers to (7) and (8) are no, has the facility closed the impoundment and provided postclosure care as a landfill (265.228c)?			
		10. Is an ignitable or reactive waste treated, or mixed before or immediately after placement in an impoundment so that the resulting waste no longer meets the definition of ignitability or reactivity (265.229a)?			
		11. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same impoundment (265.230)?			

See closure plan info

X. Disposal Site

Closure and Postclosure
(Part 265, Subpart G)

S.I. going thru closure to be submitted

	Office Yes	No	Comments
A. Postclosure			
1. Does the facility have a postclosure plan (265.118a)?	C		
2. Does the plan cover the maximum area expected to contain hazardous waste after closure, including (265.118a):			
a. Landfills.	C		
b. Disposal surface impoundments.	C		
c. Land treatment facilities where hazardous waste will remain.	C		
d. Other remaining hazardous waste (specify).	C		
3. Does the plan cover all areas where hazardous waste will remain that were active as of November 19, 1980 (265.118a)?	C		
4. Does the plan provide for 30 years of postclosure care (265.117a)?	C		
5. Does the plan clearly identify the activities required in postclosure care (265.118a)?	C		

X. Disposal Site (Continued)

Closure and Postclosure
(Part 265, Subpart G)

S.I going thru closure to be turned in

Field Yes	Field No		Office Yes	Office No	Comments
		6. Does the plan clearly identify the frequencies for postclosure care activities (265.118a)?		C	
		7. Does the plan clearly describe groundwater monitoring, including (265.118a.1):			
		a. Number of wells.		C	
		b. Sample collection activities and frequencies.		C	
		c. Sample testing procedures and frequencies.		C	
		d. Replacement of failed wells.		C	
		8. Does the plan describe maintenance for waste containment structures, including the types of activities and frequency of activities necessary to maintain (265.118a.2):			
		a. Site security systems.		C	
		b. Surveyed benchmarks.		C	
		c. Facility monitoring systems.		C	
		d. Final cover (erosion damage repair).		C	

X. Disposal Site (Continued)

Closure and Postclosure
(Part 265, Subpart G)

SI going thru closure plan being prepared

Field Office

	Field Yes	Field No	Office Yes	Office No	Comments
e. Vegetation (fertilizing and mowing).			C		
f. Runoff collection and treatment systems.			C		
g. Run-on control systems.			C		
h. Leachate collection, removal and treatment systems.			C		
i. Gas collection and treatment systems.			C		
j. Other (specify).			C		
9. Does the plan identify the name, address, and phone number of the postclosure period contact (265.118a.3)?			C		
10. Did the facility amend the plan whenever changes in operating practices, or process design, or events which occur during the active life of the facility, affect their postclosure plan (265.118b)? (Plan must be amended within 60 days after the changes or events occur.)			C		

X. Disposal Site (Continued)

Closure and Postclosure
(Part 265, Subpart G)

Closure plan being prepared

Field Yes	Field No		Office Yes	Office No	Comments
		11. Did the facility submit their postclosure plan to the RA at least 180 days before they expect to begin closure (265.118c)?	___ C	___	
		12. Did the facility amend the plan whenever changes in monitoring or maintenance plans or events which occur during the post-closure care period affect their postclosure plan (265.118e)? (Facility must petition RA to amend plan in accordance with procedures specified in Section 265.118f.)	___ C	___	
		B. Notice to Local Land Authority			
		1. For disposal facilities, were the following documents submitted to the RA and local land authority within 90 days after closure was completed (265.119):			
		a. A survey plat indicating the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks.	___ C	___	

X. Disposal Site (Continued)

Closure and Postclosure
(Part 265, Subpart G)

closure plan being prepared

Field Office			
Yes	No		Comments
		b. A record of the type, location, and quantity of hazardous waste disposed of within each cell or area of the facility.	C
		c. A record of the type, location, and quantity of the wastes disposed of before November 19, 1980.	
		C. Notice in Deed to Property	
		1. For disposal facilities, did the owner of the property record in the deed a notification that will in perpetuity notify any potential purchaser of the property that the land was used to manage hazardous waste and its use is restricted under Section 265.117c (265.120)?	C
		D. Cost Estimate for Postclosure Care	
		1. Has a written estimate been prepared of the annual cost of postclosure monitoring and maintenance of the facility (265.144a)?	C
		What is the amount of the postclosure cost estimate?	$_____

X. Disposal Site (Continued)

Closure and Postclosure
(Part 265, Subpart G)

closure plan very prepared

Field			Office		
Yes	No		Yes	No	Comments
		2. Is the annual estimate multiplied by 30 to cover the entire postclosure care period (265.144a)?	___	___	_____
		3. Does the cost estimate cover all activities in the postclosure plan (265.144a)?	___	___	_____
		4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.144b)?	___	___	_____
		5. Was the adjustment made by using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U. S. Department of Commerce in its "Survey of Current Business" (265.144b)?	___	___	_____

Latest annual deflator = _____

Previous annual deflator = _____

Inflation factor = _____ (Latest deflator/previous deflator)

Annual cost adjustment = $_____ (Latest adjusted estimate inflation)

Postclosure cost estimate = $_____ (Annual cost adjustment x 30)

X. Disposal Site (Continued)

Closure and Postclosure
(Part 265, Subpart G)

closure plan being prepared

Field Yes	Field No		Office Yes	Office No	Comments
		6. Was the cost estimate revised whenever a change in the postclosure plan increased the cost of postclosure (265.144c)? (Revised estimate must be adjusted for inflation.)			
		7. Are the following kept at the facility during the operating life of the facility (265.144d):			
		a. Latest postclosure cost estimate.			
		b. Contractor estimates and bids.			
		8. Is there written documentation supporting the postclosure cost estimate?			
		a. Workups for labor, material, and equipment requirements.			
		b. Contractor estimates and bids.			
		c. Figures derived from cost estimating handbooks.			
		d. Figures derived from operator experience.			
		9. Does the estimate accurately reflect the cost of postclosure for similar types of facilities?			

Landfills
(Part 265, Subpart N)

Closure plan being prepared

Field Yes	Field No		Office Yes	Office No	Comments
		b. The contents of each cell and the location of each hazardous waste type within each cell (265.309b).	___	___	_____
		C. Closure and Postclosure			
___ C	___	1. Has a final cover been placed over the landfill, and does the closure plan specify the function and design of the final cover (265.310a)?	___	___	_____
		2. Do the closure and postclosure plans address the following objectives and indicate how they will be achieved (265.310b):			
		a. Control of pollutant migration from the facility via groundwater, surface water, and air (265.310b.1)?	___ C	___	_____
		b. Control of surface water infiltration, including prevention of pooling (265.310b.2).	___ C	___	_____
		c. Prevention of erosion (265.310b.3).	___ C	___	_____
		3. Are the following factors addressed with respect to the objectives stated in Section 265.310b:			

Landfills
(Part 265, Subpart N)

Closure plan being ~~not~~ prepared

Field Yes	Field No		Office Yes	Office No	Comments
		a. Type and amount of hazardous waste and hazardous waste constituents in the landfill (265.310c.1).		C	
		b. The mobility and expected rate of migration of hazardous waste and hazardous waste constituents (265.310c.2).		C	
		c. Site location, topography, and surrounding land use, with respect to the potential effects of pollutant migration (e.g., proximity to groundwater, surface water, and drinking water sources (265.310c.3).		C	
		d. Climate, including amount, frequency, and pH of precipitation (265.310c.4).		C	
		e. Characteristics of the cover, including type of material, source, final surface contours, thickness, porosity, permeability, slope, length of run of slope, and			

Landfills
(Part 265, Subpart N)

Closure plan being prepared

Field Yes	Field No		Office Yes	Office No	Comments
		type of vegetation on the cover (265.310c.5).		C	
		f. Geological and soil profiles and surface and subsurface hydrology of the site (265.310c.6).		C	
		4. During the postclosure care period, does the facility:			
		a. Maintain the function and integrity of the final cover (265.310d.1).	C		
		b. Maintain and monitor the leachate collection, removal, and treatment system to prevent excess accumulation of leachate in the system (265.310d.3).	C		
		c. Maintain and monitor the gas collection system to control the vertical and horizontal escape of gases (265.310d.3).	C		
		d. Protect and maintain surveyed benchmarks (265.310d.4).	C		

Landfills
(Part 265, Subpart N)

Closure plan being prepared

Field			Office		
Yes	No		Yes	No	Comments
		e. Restrict access to the landfill (265.310d.5).			
C					N/A
		D. Requirements for Liquid Wastes			
		1. For facilities that accept bulk liquid waste or waste containing free liquids, are the following requirements met:			
		a. The landfill has a liner and leachate collection and removal system as specified in Section 264.310a (265.314a.1).			
		b. Before disposal, the liquids are treated or stabilized, chemically or physically, so that free liquids are no longer present (265.314a.2).			
		2. For facilities that accept liquids in containers, are the following requirements met prior to disposal:			
		a. All free-standing liquid is removed by decanting (265.314b.1).			

DEC 15 '81

XI. Tanks

Tanks
(Part 265, Subpart J)

2 tanks
10,000 gal → ~~closed~~ empty, to be removed, going thru closure
20,000 gal → going thru closure, contains ~ 4,000 gal of sludge

Field Yes	Field No		Office Yes	Office No	Comments
		1. Is the treatment or storage of hazardous waste in tanks conducted so that it does not (265.192a):			
		a. Generate extreme heat or pressure, fire or explosion, or violent reaction.			
✓ C					
		b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases.			
✓ C					
		c. Damage the structural integrity of the tank.			
✓ C					
		2. Are hazardous waste or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?			
✓					
		3. Do uncovered tanks have at least two feet of freeboard, dikes, or other containment features (265.192c)?			
✓ (for 20,000 gal tank) C					
		4. Where hazardous waste is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or bypass system to a standby tank (265.192d)?			
	n/a				

XI. Tanks (Continued)

Tanks
(Part 265, Subpart J)

Field			Office		
Yes	No		Yes	No	Comments
		5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			
		a. Chemically treat or store a hazardous waste which is substantially different from waste previously treated or stored in the tank (265.193a.1).	✓	—	
		b. Chemically treat hazardous waste with a substantially different process than was previously used (265.193a.2).	✓	—	
		6. Are daily and weekly inspections done for the following:			
		a. Discharge control equipment, e.g., feed cutoff, bypass, and drainage systems (daily) (265.194a.1).	✓ C	—	

XI. Tanks (Continued)

Tanks
(Part 265, Subpart J)

Field			Office		
Yes	No		Yes	No	Comments
		b. Data gathered from monitoring equipment, e.g., pressure and temperature gauges (daily) (265.194a.2).	✓ C		
		c. Level of waste in uncovered tanks (daily) (265.194a.3).	✓ C		
		d. Construction materials of tank, e.g., corrosion, leaking fixtures or seams (weekly) (265.194a.4).	✓ C		
		e. Discharge confinement structures, e.g., dikes (weekly) (265.194a.5).	✓ C		
		7. At closure, are all hazardous wastes and residues removed from tanks and associated equipment and structures (265.197)?	✓ C		
n/a		8. Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or			

XI. Tanks (Continued)

Tanks
(Part 265, Subpart J)

Field			Office		
Yes	No		Yes	No	Comments
N/A C		9. Are ignitable or reactive wastes stored or treated in such a way that it is protected from conditions which may cause the wastes to ignite or react (265.198a.2)?			
✓ C		10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)?			
✓ C		11. Are incompatible wastes stored in separate tanks (265.199a)?			
✓ C		12. Are hazardous wastes not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)?			

XV. Storage of Containers

Use and Management of Containers
(Part 265, Subpart I)

Field Yes	Field No		Office Yes	Office No	Comments
X C	X	1. Does the facility transfer hazardous waste from containers not in good condition or leaking to containers in good condition (265.171)?			dented + rusty drums observed see photos
✓ C		2. Are containers compatible with hazardous waste stored in them (265.172)?			
✓ C		3. Are containers stored closed (265.173a)?			
✓ C		4. Are containers managed to prevent rupture or leakage (265.173b)?			
✓ C		5. Are containers inspected weekly for leaks and deterioration (265.174)?			uninspected but dented drums not indicated.
✓ C		6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?			
✓ C		7. Are incompatible wastes stored in separate containers (265.177a)?			
N/a C		8. Are hazardous wastes not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?			
		9. Are containers holding a hazardous waste that is incompatible with any waste or materials stored			N/a

XV. Storage of Containers (Continued)

Use and Management of Containers (Part 265, Subpart I)

Field			Office		
Yes	No		Yes	No	Comments
		nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device (265.177c)?			
✓ C	—				
		10. Are containers that are not empty managed as hazardous wastes (261.7a.2)?			
✓ C	—				
		*11. For a container to be considered empty, the facility must ensure that:			
		a. No more than one inch of residue remains on the bottom of the container or inner lining (261.7b.1).			
— C	—				
		b. Containers that held an acutely hazardous waste are triple-rinsed using a solvent capable of removing the contents (261.7b.3).			
n/a C	—				

* California regulates containers with any residue. If violations occur, indicat whether violations are federal or state.

Facility Status Sheet

FORM SUBMITTED BY: P. Barni
DATE: 4/20/87 (M D Y)

A. EPA ID: ICIAID1010151113101415151
FACILITY NAME: Fuller O'Brien

A1. Entry type: ☐ New ☑ Update
A2. Facility type: ☑ Major ☐ Non-major

MAY 29 1987

1. GROUNDWATER MONITORING
Status: 1A. ☐ Detection (Go on to 2) ☐ Assessment (Go on to 2) ☐ Waiver (Skip to 6) ☐ NA (Skip to 8)

	EVALUATED?	ADEQUATE?	
2. Groundwater Monitoring Well System:	2A. ☐ NE Date: __/__/__ (M D Y)	2B. ☐ Yes ☐ No	
3. Groundwater Sampling, Analysis and Evaluation Program:	3A. ☐ NE Date: __/__/__ (M D Y)	3B. ☐ Yes ☐ No	
4. Notice of Significant Increase in Indicator Concentrations:			4. Submitted? ☐ No __/__/__ (M D Y)
5. Groundwater Quality Assessment Report:			5A. Submitted? ☐ No __/__/__ (M D Y)
	5B. ☐ NE Date: __/__/__ (M D Y)	5C. ☐ Yes ☐ No	5D. Showed hazardous constituents in ground water? ☐ Yes ☐ No
6. Waiver Demonstration:	6A. ☐ NE Date: __/__/__ (M D Y)	6B. ☐ Yes ☐ No	
7. Groundwater Monitoring Records:	7A. ☐ NA ☐ NE Date: __/__/__ (M D Y)	7B. ☐ Yes ☐ No	
8. Activities Subject to CLOSURE/POSTCLOSURE:	☐ Landfill ☑ Surface Impoundment ☐ Land Treatment/Application	☐ Incinerator ☐ Waste Pile ☑ Other (Specify) tanks: 10,000 gallon 20,000 gallon	

11/1/85

	EVALUATED?	ADEQUATE?	
9. Closure Plan:	9A. ☐ NA ☑ NE Date ___/___/___ M D Y	9B. ☐ Yes ☐ No	To be submitted 4/30/07
10. Closure Cost Estimate:	10A. ☐ NA ☐ NE Date ___/___/___ M D Y	10B. ☐ Yes ☐ No	10C. Amount: $_____ Unknown: ☐
11. Closure Assurance Instrument(s):	11A. ☐ NA ☐ NE Date ___/___/___ M D Y	11B. ☐ Yes ☐ No	
	11C. Instrument type(s): ☐ Trust Fund ☐ Letter of Credit ☐ Corporate Guarantee ☐ Financial Bond ☐ Insurance ☐ State Guarantee ☐ Performance Bond ☐ Financial Test ☐ Other State Mechanism		
12. Post-closure Plan:	12A. ☐ NA ☑ NE Date ___/___/___ M D Y	12B. ☐ Yes ☐ No	
13. Post-closure Cost Estimate:	13A. ☐ NA ☐ NE Date ___/___/___ M D Y	13B. ☐ Yes ☐ No	13C. Amount: $_____ Unknown: ☐
14. Post-closure Assurance Instrument(s):	14A. ☐ NA ☐ NE Date ___/___/___ M D Y	14B. ☐ Yes ☐ No	
	14C. Instrument type(s): ☐ Trust Fund ☐ Letter of Credit ☐ Corporate Guarantee ☐ Financial Bond ☐ Insurance ☐ State Guarantee ☐ Performance Bond ☐ Financial Test ☐ Other State Mechanism		
15. Sudden Liability Instrument(s):	15A. ☐ NA ☐ NE Date ___/___/___ M D Y	15B. ☐ Yes ☐ No	15C. Amount? $_____ per occurrence $_____ annual aggregate
	15D. Instrument type(s) ☐ Insurance Policy ☐ State Guarantee ☐ Financial Test ☐ Other State Mechanism		
16. Non-sudden Liability Instrument(s):	16A. ☐ NA ☐ NE Date ___/___/___ M D Y	16B. ☐ Yes ☐ No	16C. Amount? $_____ per occurrence $_____ annual aggregate
	16D. Instrument type(s): ☐ Insurance Policy ☐ State Guarantee ☐ Financial Test ☐ Other State Mechanism		

17. Closure Process:	17A. Process begun?		☐ No	Date Begun M 6 / D / Y 85
	17B. In accordance with approved plan and required procedures?	☑ Yes	☐ No	
	17C. Closure certifications received?		☐ No	Date Received M / D / Y
	17D. Facility released from closure assurance and liability requirements?	☐ NA	☐ No	Date Released M / D / Y
18. Post-Closure Process:	18A. Process begun?		☐ No	Date Begun M / D / Y
	18B In accordance with approved plan and required procedures?	☐ Yes	☐ No	
	18C. Survey plat/record of wastes received?		☐ No	Date Received M / D / Y
	18D. Post-closure period completed?		☐ No	Date Completed M / D / Y
	18E. Facility released from post-closure assurance requirements?	☐ NA	☐ No	Date Released M / D / Y
19. Permit Application:	19A. Called In?		☐ No	Date Called M 10 / D / Y 85
	19B. Reason for permit application call-in: ☐ Groundwater ☐ Financial Assurance ☐ Closure ☐ Liability Coverage ☑ Other			
20. Comments:	facility is submitting closure report for surface impoundments as required by the HWCA 86/87-02, Stipulation to Entry of Order and Schedule of Compliance signed 3-11-87. The tank closures will also be submitted at that time			

11/7/03

01 JUL 1986

Inspection Report
U.S. Environmental Protection Agency
Region 9
Toxics and Waste Management Division
Field Operations Branch

Purpose: Interim Status Inspection

Facility Name: O'Brien Corporation

Street: 450 E Grand St

City: SSF **State:** CA **Zip Code:** 94080

EPA ID number: CAD065130455

Report Number: 0

Date of Investigation: May 29, 1986

EPA Inspector(s): 0

State Inspector(s): Patti Barni

Facility Representative(s): Mike Burdine
Don Mazzone

Report Prepared By:

Form A - Interim Status Standards for Facilities
that Treat, Store or Dispose of Hazardous Waste

I. General Information:

(A) **Operator:** O'Brien Corporation

Street: 450 E Grand

City: SSF **State:** CA **Zip Code:** 94080

(B) **Owner:** - Same as above -

Street:

City: **State:** **Zip Code:**

(C) **Site Activity:**

✓ Generation: Complete Form B

___ Transportation: Complete Form C

___ Small Quantity Generator: Complete Form D

___ Recycler: Complete Form E

Storage:

✓ Container (S01)

✓ Tank (S02)

___ Waste Pile (S03)

Disposal:

___ Injection Well (D79)

___ Landfill (D80)

___ Land Application (D81)

Form A - Interim Status Standards for Facilities
that Treat, Store or Dispose of Hazardous Waste

I. General Information:

(A) **Operator:** O'Brien Corporation

Street: 450 E Grand

City: SSF **State:** CA **Zip Code:** 94080

(B) **Owner:** - Same as above -

Street:

City: **State:** **Zip Code:**

(C) **Site Activity:**

✓ Generation: Complete Form B

___ Transportation: Complete Form C

___ Small Quantity Generator: Complete Form D

___ Recycler: Complete Form E

Storage:

✓ Container (S01)

✓ Tank (S02)

___ Waste Pile (S03)

___ Surface Impoundment (S04)

Disposal:

___ Injection Well (D79)

___ Landfill (D80)

___ Land Application (D81)

___ Ocean Disposal (D82)

___ Surface Impoundment (D83)

Treatment:	Process Code:	Design Capacity:
✓ Tank (T01)	T01	20,000 & 10,000
___ Surface Impoundment (T02)		
___ Incinerator (T03)		
Other (T04)		

I. General Information: - Continued

(D) Nature Of Business:

Manufactures paints and resins

(E) Description Of Facility Processes:

treatment: 2 tanks, 10,000 & 20,000 gallon capacity; latex washwater is pumped during daytime shift only from process area to tanks. Treatment takes place in the 20,000 gallon tank. alum and polymer is added for metal flocculation. Effulent is discharged to the sanitary sewer under a SSF permit. Sludge is drummed for disposal within 90 days.

Storage: sludge from treatment
powdered wastes occasionally generated from discontinued pigments.

spent solvents: used to clean any dirty paint tanks when no longer of value or use declared a waste and picked up by a recycler. No specific tank assigned to store spent solvents.

I. General Information: - Continued

(F) Report Attachments:

April 28, 1986 Draft Remedial Action Order from DOHS → O'Brien

II. Interim Status:
(Part 270 Subpart G)

	Yes	No	Comments
(A) Qualifying For Interim Status:			
1. For the existing facility to be treated as having been issued a permit, the facility must have:			
a. Submitted a notification of H.W. activity (270.70a.1)?			
b. Submitted Part A of the permit application (270.70a.2)?	✓		
c. Achieved compliance with RCRA interim status standards (270.70b)?			
(B) Operating During Interim Status:			
1. Has the facility complied with the following restrictions:			
a. Has only treated, stored or disposed of H.W. specified in the Part A (270.71a.1)?	✓		
b. Has only employed processes specified in the Part A (270.71a.2)?	✓		Not using surface impoundments are going through closure
c. Has not exceeded design capacities specified in the Part A (270.71a.3)?	✓		
(C) Changes During Interim Status:			
1. Has a revised Part A been submitted prior to the following changes:	no		
a. T/S/D of H.W. not previously identified in the Part A (270.72a)?		✓	n/a
b. Increases in design capacity of processes (270.72b)?		✓	
c. Changes in or additions to processes (270.72c)?		✓	
d. Change in ownership (270.72d)?		✓	
2. Have the changes made not amounted to reconstruction (270.72e)?		✓	

III. General Facility Standards:
(Part 265 Subpart B)

	Yes	No	Comments
(A) Required Notices:			
1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?			n/a
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?			n/a
(B) General Waste Analysis:			
1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)?	✓		
2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)?	✓		
3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)?	✓		
4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?	✓		
5. Is the analysis repeated when there is a change in the process (265.13a.3)?			n/a
6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?			n/a
7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?			n/a

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
8. Does the facility have a detailed waste analysis plan (265.13b)?	✓		
9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)?	✓		
10. Does the waste analysis plan contain the following elements:			
a. Parameters of analysis of each H.W. handled (265.13b.1)?		✓	
b. Rationale for the selection of each parameter (265.13b.2)?		✓	
c. Test methods used to obtain a representative sample of H.W. (265.13b.3)?		✓	
d. Frequency which each analysis will be repeated (265.13b.4)?	✓		
e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)?			n/a
11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)?			n/a
12. For off-site facilities, does the plan contain the following elements:			
a. Description of procedures used to identify each movement of H.W. (265.13c.1)?			n/a
b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)?			n/a

(C) Security:

1. Do security measures include:			
... (265.14b.1)?	✓		

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
b. Artificial or natural barriers and controlled entry (265.14b.2)?	✓		
c. Signs with the legend "Danger- Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)?	✓		
(D) General Inspection Requirements:			
1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)?	✓		
2. Does the facility follow a written inspection schedule (265.15b.1)?	✓		
3. Is the schedule kept at this facility (265.15b.2)?	✓		
4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.3)			
a. monitoring equipment?	✓	often	alarm systems checked every wednesday
b. safety, emergency equipment?	✓		
c. security equipment?	✓		
d. operating and structural equipment?	✓		
5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)?	✓		
6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)?		✓	
7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)?	✓		

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
8. Are inspections recorded in an inspection log (265.15d)?	✓		
9. Does the log include: (265.15d)			
a. Date and time of inspection?	✓		
b. Name of inspector?	✓		
c. Observations recorded?	✓		
d. Date and nature of repairs or other remedial actions?	✓ in most cases		
10. Are inspection records kept for at least 3 years (265.15d)?	✓		
(E) Personnel Training:			
1. Does the facility have a personnel training program (265.16a.1)?	✓		
2. Is it directed by a person trained in H.W. management procedures (265.16a.2)?	✓		
3. Does the program include training in: (265.16a.3)			
a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	✓		repairing & replacement done by different union or perhaps outside contractor
b. Emergency procedures including contingency plan implementation?	✓		
4. Do new personnel receive required training within 6 months (265.16b)?	✓		
5. Do personnel take part in an annual review of the initial training (265.16c)?	✓		

III. General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
6. Do personnel training records include: (265.16d)			
a. Job titles?	✓		
b. Job Descriptions?	✓		
c. Descriptions of training?	✓		
b. Records of training?	✓		
(F) Requirements For Ignitable, Reactive, Or Incompatible Wastes:			
1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a)			
a. Separation and protection from ignition sources?			n/a
b. No smoking signs in hazard areas?	✓		
2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a. Generate extreme heat or pressure, fire or explosion, or violent reaction?			n/a
b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?			n/a
c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners)			n/a
d. Threaten human health or the environment?			n/a

IV. Preparedness and Prevention:
(Part 265 Subpart C)

	Yes	No	Comments
(A) Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)?	✓		
(B) Required Equipment:			
1. Does the facility have the following equipment where applicable:			
a. Internal communications or alarm systems (265.32a)?	✓		
b. Telephone or 2-way radios at the scene of operation (265.32b)?	✓		
c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)?	✓		
d. Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)?	✓		
(C) Testing And Maintenance Of Equipment:			
1. Does the facility test and maintain emergency equipment in operable condition (265.33)?	✓		
(D) Access To Communications Or Alarm Systems:			
1. Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)?	✓		
(E) Required Aisle Space:			
1. Is their adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)?	✓		

IV. Preparedness and Prevention: - Continued
(Part 265 Subpart C)

	Yes	No	Comments
(F) Arrangements With Local Authorities:			
1. Has the facility made the following arrangements:			
a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?	✓		not in writing all verbal agreements
b. Agreements designating primary emergency authority (265.37a.2)?			developing contract with IT
c. Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)?			
d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?	✓		~~OH~~ OMC clinic
2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?		✓	

V. Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	Yes	No	Comments
(A) Does the facility have a contingency plan (265.51a)?	✓		
(B) Content Of Contingency Plan:			
1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)?	✓		
2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)?	✓		
3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility)	✓		
4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	✓		
5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)?	✓		
(C) Copies of Contingency Plan:			
1. Is the plan maintained at the facility (265.53a)?	✓		
2. Has the plan been submitted to all local emergency organizations (265.53b)?	✓		→ discussed Plan with the local fire dept.

V. Contingency Plan and Emergency Procedures: - Con't.
(Part 265 Subpart D)

	Yes	No	Comments
(D) Amendment Of Contingency Plan:			
1. Has the plan been reviewed and immediately amended when required (265.54)?	✓		approximately annually and as needed for emergency coordinator changes.
(E) Emergency Coordinator:			
1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?	✓		
2. Does the coordinator have authority to carry out the contingency plan (265.55)?	✓		
(F) Emergency Procedures:			
1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)?	✓		has proper documentation with E.C. duties outlined

VI. Manifest System, Recordkeeping, and Reporting:
(Part 265 Subpart E)

	Yes	No	Comments
(A) Use of Manifest System:			
1. Does the facility comply with the following manifest requirements:			
a. Sign and date each copy of the manifest (265.71a.1)?	✓		
b. Note any significant * discrepancies in the manifest (265.71a.2)?	✓		
c. Give transporter one copy of the signed manifest (265.71a.3)?	✓		
d. Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)?	✓		
2. Are records of past shipments retained for 3 years (265.71a.5)?	✓		
(B) Manifest Discrepancies:			
1. Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)?	✓		
2. For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)?	✓		
(C) Operating Record:			
1. Does the facility maintain an operating record (265.73a)?	✓		

* Significant discrepancies are:
1. For bulk waste; variations > 10% in weight
2. For containerized waste; variations > one drum
3. Obvious differences such as waste solvent substituted for waste acid

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	Yes	No	Comments
2. Does the operating record contain the following information:			
a. A description and the quantity of each waste received (265.73b.1)?	✓		
b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)?	✓		
c. The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific manifest numbers.)	✓		
d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)?			n/a
e. Records and results of all waste analysis and trial tests (265.73b.3)?	✓		
f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)?		✓	never used the plan
g. Records and results of operator inspections (265.73b.5)?	✓		
h. Monitoring data (265.73b.6)?	✓		
i. All closure and post-closure costs as applicable (265.73b.7)?	✓		
(D) Availability, Retention, Disposition Of Records:			
1. Are all records including plans available for inspection (265.74a)?	✓		
2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon			

VI. Manifest System, Recordkeeping, and Reporting: - Con't.
(Part 265 Subpart E)

	Yes	No	Comments
(E) Biennial Report:			
1. Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?	✓		
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year (265.75)?	✓		
3. Does the report include the following infromation: (265.75)			
a. EPA identification number, name and address of the facility?	✓		
b. Calendar year covered by report?	✓		
c. For off-site facilities, the EPA identification number of each generator?			n/a
d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?	✓		
e. Methods of treatment, storage, or disposal for each H.W.?	✓		
f. Monitoring data under § 265.94a.2.ii and iii and b.2 ?			
g. Most recent closure and post-closure cost estimates?	✓		
h. Required certification?	✓		

VI. Manifest System, Recordkeeping, and Reporting: - Con't
(Part 265 Subpart E)

	Yes	No	Comments
(F) Unmanifested Waste Report:			
1. For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)?	___	___	n/a
(G) Additional Reports:			
1. Has the facility reported to the RA: (265.77)			
a. Releases, fires and explosions?	___	✓	→ no incidents to report
b. Ground-water contamination and monitoring data?	___	___	
c. Facility closure?	___	___	in process of closure one report issued but due to additional contamination closure is still not completed.

VII. Ground-Water Monitoring: (Part 265 Subpart F) NOT Reviewed by DOHS personnel

	Yes	No	Comments
(A) Has a ground-water monitoring program (capable of determining the facility's impact on the quality of ground-water in the uppermost aquifer underlying the facility) been implemented (265.90a)?	___	___	_____
(B) Ground-Water Monitoring System:			
1. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area (265.91a.1)?	___	___	_____
a. Are ground-water samples from the uppermost aquifer representative of background ground-water quality and not affected by the facility? (as ensured by proper well number, locations and depths) (265.91a.1)	___	___	_____
2. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste management area (265.91a.2)?	___	___	_____
a. Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of H.W. or H.W. constituents that migrate from the waste management area to the uppermost aquifer (265.91a.2)?	___	___	_____
3. Have the locations of the waste management areas been verified to conform with information in the ground-water program (265.91b)?	___	___	_____
a. If the facility contains multiple waste ma ment components, is each component adequately monitored (265.91 b & b.2)?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
4. Do the numbers, locations, and depths of the monitoring wells agree with the data in the ground-water monitoring system program (265.91b)?	___	___	_____
5. Well completion details: (265.91c)			
a. Are wells properly cased?	___	___	_____
b. Are wells properly screened and packed where necessary to enable sampling at appropriate depths?	___	___	_____
c. Are annular spaces properly sealed to prevent contamination of ground-water?	___	___	_____
(C) Sampling And Analysis:			
1. Has a ground-water sampling and analysis plan been developed (265.92a)?	___	___	_____
a. Has it been followed?	___	___	_____
b. Is the plan kept at the facility?	___	___	_____
c. Does the plan include procedures and techniques for:			
i. Measurement of ground-water surface elevations (265.92a.1)?	___	___	_____
ii. Sample collection (265.92a.1)?	___	___	_____
iii. Sample preservation (265.92a.2)?	___	___	_____
iv. Sample shipment (265.92a.2)?	___	___	_____
v. Analytical procedures (265.92a.3)?	___	___	_____
vi. Chain of custody control (265.92a.4)?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
2. Are the required parameters in ground-water samples being tested quarterly for the first year (265.92b and 265.92c.1)?	___	___	_____
a. Are the ground-water samples analyzed for parameters characterizing the suitability of the ground-water as a drinking water supply * (265.92b.1)?	___	___	_____
b. Are the ground-water samples analyzed for parameters establishing ground-water quality * (265.92b.2)?	___	___	_____
c. Are the ground-water samples analyzed for parameters used as indicators of ground-water contamination * (265.92b.3)?	___	___	_____
2. For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring (265.92c.2)?	___	___	_____
3. Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year (265.92c.2)?	___	___	_____

* EPA interim primary drinking water standards:
Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate(as N), Selenium, Silver Endrin, Lindane, Methoxychlor, Toxaphene, 2-4 D, 2,4,5-TP Silver, Radium, Gross Alpha, Gross Beta, Turbidity, Coliform Bacteria.

Parameters establishing ground-water quality:
Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.

Parameters used as indicators of ground-water contamination:
pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
4. For facilities which have completed first year ground-water sampling and analysis requirements:			
a. Have samples been obtained and analyzed for the ground-water quality parameters at least annually (265.92d.1)?	___	___	_____
b. Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually (265.92d.2)?	___	___	_____
5. Were ground-water surface elevations determined at each well each time a sample was taken (265.92e)?	___	___	_____
D) Preparation, Evaluation, And Response:			
1. Has an outline of a ground-water quality assessment program been prepared (265.93a)?	___	___	_____
a. Does it describe a program capable of determining:			
i. Whether H.W. or H.W. constituents have entered the ground-water (265.93a.1)?	___	___	_____
ii. The rate and extent of migration of H.W. or H.W. constituents (265.93a.2)?	___	___	_____
iii. Concentrations of H.W. or H.W. constituents in ground-water (265.93a.3)?	___	___	_____
2. After the first year of monitoring, have at least 4 replicate measurements of each indicator parameter been obtained for samples taken for each well (265.93b)?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
a. Were the results compared with the initial background means from the upgradient well(s) determined during the first year (265.93b)?	___	___	_____
i. Was each well considered individually (265.93b)?	___	___	_____
ii. Was the Student's t-test used (at the 0.01 level of significance) (265.93b)?	___	___	_____
b. Was a significant increase (or pH decrease) found in the:			
i. Upgradient wells?	___	___	_____
ii. Downgradient wells?	___	___	_____
If "Yes", complete the Compliance Form For A Facility Which May Be Affecting Ground-Water Quality.			
3. Were the ground-water surface elevations evaluated annually to determine whether the monitoring wells are properly placed (265.93f)?	___	___	_____
4. If it was determined that modification of the number, location or depth of monitoring wells was necessary, was system brought into compliance with 265.91a (265.93f)?	___	___	_____
(E) Recordkeeping And Reporting:			
1. Have records been kept of analysis for parameters in 265.92c and d (265.94a.1)?	___	___	_____
2. Have records been kept of ground-water surface elevations taken at the time of sampling for each well (265.94a.1)?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

	Yes	No	Comments
3. Have records been kept of required evaluations in 265.93b (265.94a.1)?	___	___	_____
4. Have the following been submitted to the RA: (265.94a.2)			
a. Initial background concentrations of parameters listed in 265.92b within 15 days after completing each quarterly analysis required during the first year?	___	___	_____
b. For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	___	___	_____
c. Annual reports including:			
i. Concentrations or values of parameters used as indicators of ground-water contamination for each well along with required evaluations under 265.93b?	___	___	_____
ii. Any significant differences from initial background values in upgradient wells separately identified?	___	___	_____
iii. Results of the evaluation of ground-water elevations?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting Ground-Water Quality

	Yes	No	Comments
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) shown a significant increase (or pH decrease) over initial background?	___	___	_____
a. If "Yes", has this information been submitted to the RA according to 265.94a.2.ii (265.93c.1)?	___	___	_____
2. Have comparisons of indicator parameters for the downgradient wells shown a significant increase (or pH decrease) over initial background?	___	___	_____
a. If "Yes", were additional ground-water samples taken for those downgradient wells where the significant differences was determined (265.93c.2)?	___	___	_____
i. Were samples split in two?	___	___	_____
ii. Was the significant differences due to human (e.g., laboratory) error?	___	___	_____
If "Yes", do not continue			
3. If significant differences were not due to error, was a written notice sent to the RA within 7 days of confirmation (265.93d.1)?	___	___	_____
4. Within 15 days of notification to the RA was a certified ground-water quality assessment plan submitted (265.93d.	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting Ground-Water Quality

	Yes	No	Comments
5. Does the ground-water quality assessment plan specify: (265.93d.3)			
a. Monitoring well information including well numbers, locations and depths?	___	___	_____
b. Sampling methods?	___	___	_____
c. Analytical methods?	___	___	_____
d. Evaluation methods?	___	___	_____
e. Schedule of implementation?	___	___	_____
6. Does the plan allow for determination of: (265.93d.4)			
a. Rate and extent of migration of H.W. or H.W. constituents?	___	___	_____
b. Concentrations of the H.W. or H.W. constituents?	___	___	_____
7. Is it indicated that the first determination was made as soon as technically feasible (265.93d.5)?	___	___	_____
a. Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the RA?	___	___	_____
8. Was it determined that H.W. or H.W. constituents from the facility have entered the ground-water?	___	___	_____
a. If "No", was the original indicator evaluation program, required by 265.92 and 65.93b, reinstated?	___	___	_____
b. Was the RA notified of the reinstatement of the program within 15 days of the determination (265.93d.6)?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting Ground-Water Quality

	Yes	No	Comments
9. If it was determined that H.W. or H.W. constituents have entered the ground-water: (265.93d.7)			
a. For facilities where the program was implemented prior to final closure, are determinations of H.W or H.W. constituents continued on a quarterly basis (265.93d.7)? (If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)	___	___	_____
b. Were subsequent ground-water quality reports submitted to the RA within 15 days of determination (265.93d.7)?	___	___	_____
c. Were records kept of the analysis and evaluations specified in the ground-water quality assessment (throughout the active life of the facility) (265.94b.1)?	___	___	_____
d. If a disposal facility, were (are) records kept throughout the post-closure period as well (265.94b.1)?	___	___	_____
10. Are annual reports submitted to the RA containing the results of the ground-water quality assessment program (265.94b.2)?	___	___	_____
a. Do the reports include the calculated or measured rate of migration of H.W. or H.W. constituents during the reporting period (265.94b.2)?	___	___	_____

VII. Ground-Water Monitoring: - Continued
(Part 265 Subpart F)

Compliance Form For Demonstrating A Waiver Of Interim Status Requirements

	Yes	No	Comments
1. Is a written waiver demonstration kept at the site (265.90c)?	___	___	_____
2. Is the demonstration certified by a qualified geologist or geotechnical engineer (265.90c)?	___	___	_____
3. Does the waiver demonstration establish the potential for migration of H.W. or H.W. constituents from the facility to the uppermost aquifer (265.90c.1)?	___	___	_____
a. Does the evaluation of a water balance include:			
i. Precipitation?	___	___	_____
ii. Evapotranspiration?	___	___	_____
iii. Runoff?	___	___	_____
iv. Infiltration? (including any liquid in surface impoundments)	___	___	_____
b. Does the evaluation of the unsaturated zone characteristics include:			
i. Geologic Materials?	___	___	_____
ii. Physical Properties?	___	___	_____
iii. Depth to ground-water?	___	___	_____
4. Does the waiver demonstration establish the potential for H.W. or H.W constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water (265.90c.2)?	___	___	_____
a. Does the evaluation of the saturated zone characteristics include?			
i. Geologic materials?	___	___	_____
ii. Physical properties?	___	___	_____
iii. Rate of ground-water flow?	___	___	_____
iv. Proximity of the facility to water supply wells or surface			

VIII. Closure and Post-Closure: (Part 265 Subpart G)

O'Brien is in the process of closing its 3 surface impoundments

	Yes	No	Comments
(A) Closure Plan:			
1. Does the facility have a closure plan (265.112a)?	✓		
2. Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)?	✓		
3. Do the steps to close in the plan include: (265.112a)			
a. Pre-treatment of H.W.?		✓	n/a
b. Treatment of H.W.?	✓		
c. Removal of H.W. from process units?	✓		
d. Disposal of H.W.?	✓		
e. Decontamination of equipment and structures?	✓		
f. Scheduled inspections for closure certification purposes?	✓		
3. Does the description of how and when the facility will be closed include the following elements:			
a. Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1)?			
For facilities that have designated H.W. management areas inactive prior to Nov. 19, 1980, are records available documenting the cessation of activity or final closure?			
Was a Notification of Hazardous Waste Site submitted to EPA as required by § 103c of CERCLA ?			

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
b. Estimate of the maximum inventory of H.W. in storage and in treatment at any time during the life of the facility (265.112a.2)?	✓		
c. Does the inventory include the maximum amount of on-site:			
H.W. in surface impoundments?			
H.W. in tanks?	✓		
H.W. in piles?			n/a
H.W. in containers?	✓		
H.W. in drainage pits or sumps?			n/a
Contaminated soil from spills or leaks?	✓		
Contaminated soils and liners from non-disposal impoundments?			n/a
Contaminated soils from land treatment fields?	✓		
Decontamination residues?	✓		
Process residues?	✓		
Other (specify)?			
d. Decontamination procedures including: (265.112a.3)			
A list of equipment, containers, structures requiring decontamination?	✓		
Sampling and analytical methods for determining whether soil contamination or decontamination residues are H.W.?	✓		
Testing criteria for determining adequacy of clean-up?	✓		
Methods of treatment or disposal of	✓		

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
e. Estimate of the expected year of closure (265.112a.4)?	✓		don't plan to close drum treatment
f. Schedule for final closure activities (265.112a.4)?	✓		
g. Does the schedule include:			
Total time required to close?	✓		
Time required for intervening closure activities? (e.g., Time required for H.W. treatment, disposal, decontamination, and certification inspections.)	✓		
4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.)	✓		
5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?	✓		for ponds closure was submitted 1/85
(B) Time Allowed For Closure:			
1. Does the schedule for final closure allow for the following:			
a. Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)?	✓		
b. Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)?	✓		problems arose during pond closure so it has taken far longer than 180 days

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
(C) Disposal And Decontamination Of Equipment:			
1. For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)?	___	___	n/a
(D) Certification Of Closure:			
1. For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?	___	___	n/a
(E) Partial Closure:			
1. Does the facility plan to close discreet regulated H.W. manage-units during the intended operating life?	✓	___	O'Brien is currently closing its surface impoundments.
If "Yes" complete compliance form for partial closure.			

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

Compliance Form For Partial Closure

	Yes	No	Comments
(E) Partial Closure:			
1. Does the closure plan describe how the facility will be partially closed (265.112a.1)?			ponds are being closed out;
2. Does the plan describe the size of areas partially closed?	✓		
3. Does the plan describe the procedures for partial closure?	✓		
4. Does the plan address maintenance activities, including: (265.112a.1)			
a. Visual inspections?			
b. Ground-water monitoring?	✓		
c. Maintaining cover?			
d. Maintaining diversion structures?			
e. Controlling erosion?			ponds are going thru closure.
f. Maintaining vegetation?			not all areas
g. Maintaining site security systems?			are still active.
h. Leachate collection system?			not all closure -
i. Gas collection system?			post closure aspects
j. Other (specify)?			have been resolved
5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?		✓	
6. Does the plan describe when the facility will be partially closed (265.112a.1)?	✓		
7. Does the schedule for partial closure include: (265.112a.1)			
a. Date(s) of partial closure(s)?	✓		
b. Total time required for each partial closure?	✓		
c. Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vege- [illegible] certification.)	✓		

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
(F) Post-Closure:			O'Brien has not prepared a post-closure plan for its surface impoundments - we are not that far along yet. It will be needed.
1. Does the facility have a post-closure plan (265.118a)?			
2. Does the plan cover the maximum area expected to contain H.W. after closure, including: (265.118a)			
a. Landfills?	___	___	_____
b. Disposal surface impoundments?	___	___	_____
c. Land treatment facilities where H.W. will remain?	___	___	_____
d. Other remaining H.W. (specify)?			
3. Does the plan cover all areas where H.W. will remain that were active as of Nov. 19, 1980 (265.118a)?	___	___	_____
4. Does the plan provide for 30 years of post-closure care (265.117a)?	___	___	_____
5. Does the plan clearly identify the activities required in post-closure care (265.118a)?	___	___	_____
6. Does the plan clearly identify the frequencies for post-closure care activities (265.118a)?	___	___	_____
7. Does the plan describe ground-water monitoring, including: (265.118a.1)			
a. Number of wells?	___	___	_____
b. Sample collection activities and frequencies?	___	___	_____
c. Sample testing procedures and frequencies?	___	___	_____
d. Replacement of failed wells?	___	___	_____

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
8. Does the plan describe maintenance for waste containment structures, including the types of activities and frequency of activities necessary to maintain: (265.118a.2)			
a. Site security systems?			
b. Surveyed benchmarks?			
c. Facility monitoring systems?			
d. Final cover (erosion damage repair)?			
e. Vegetation (fertilizing and mowing)?			
f. Runoff collection and treatment systems?			
g. Runon control systems?			
h. Leachate collection, removal and treatment systems?			
i. Gas collection and treatment systems?			post closure plan
j. Other (specify)?			not developed
9. Does the plan identify the name, address and phone number of the post-closure period contact (265.118a.3)?			
10. Did the facility amend the plan whenever changes in operating practices, or process design, or events which occur during the active life of the facility, affect their post-closure plan (265.118b)? (Plan must be amended within 60 days after the changes or events occur.)			
11. Did the facility submit their post-closure plan to the RA at least 180 days before they expect to begin closure (265.118c)?			
12. Did the facility amend the plan whenever changes in monitoring or maintenance plans or events which occur during the post-closure care period affect their post-closure plan (265.118e)? (Facility must petition RA to amend plan in accordance with procedures			

VIII. Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	Yes	No	Comments
(G) Notice To Local Land Authority:			
1. For disposal facilities, were the following documents submitted to the RA and local land authority within 90 days after closure was completed: (265.119)			
a. A survey plat indicating the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?	___	___	___
b. A record of the type, location, and quantity of H.W. disposed of within each cell or area of the facility?	___	___	post closure plan not developed yet
c. A record of the type, location, and quantity of the wastes disposed of before Nov. 19, 1980?	___	___	___
(H) Notice In Deed To Property:			
1. For disposal facilities, did the owner of the property record in the deed a notation that will in perpetuity notify any potential purchaser of the property that the land was used to manage H.W. and its use is restricted under § 265.117c (265.120)?	___	___	___

DOT, covered

IX. Financial Requirements: See attached draft order
(Part 265 Subpart H)

	Yes	No	Comments
(A) Cost Estimate For Closure:			A draft remedial action order was issued on April 25, 1986 to O'Brien regarding its financial responsibility concerning closure, post-closure, & liability.
1. Has a written estimate been prepared of the cost of closing the facility (265.142a)?	___	___	_____
What is the amount of the closure cost estimate? $_____			
2. Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive (265.142a)?	___	___	_____
3. Does the cost estimate cover all the activities in the closure plan (265.142a)?	___	___	_____
4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.142b)?	___	___	_____
5. Was the adjustment made by using an inflation factor derived from the Annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.142b)?	___	___	_____

Latest Annual Deflator = _____

Previous Annual Deflator = _____

Inflation Factor = _____ (latest deflator/previous deflator)

Current Cost Adjustment = $_____ (latest adjusted estimate x inflation factor)

IX. Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
6. Was the cost estimate revised whenever a change in the closure plan increased the cost of closure (265.142c)? (Revised estimate must be adjusted for inflation.)	___	___	_____
7. Are the following kept at the facility during the operating life of the facility: (265.142d)			
a. Latest closure cost estimate?	___	___	_____
b. Latest adjusted closure cost estimate?	___	___	_____
8. Is there written documentation supporting the closure cost estimate?	___	___	_____
a. Workups from labor, material and equipment requirements?	___	___	_____
b. Contractor estimates and bids?	___	___	_____
c. Figures derived from cost estimating handbooks?	___	___	_____
d. Figures derived from operator experience?	___	___	_____
9. Does the estimate accurately reflect the cost of closure for similar types of facilities?	___	___	_____

IX. Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
(B) Cost Estimate For Post-Closure Care:			
1. Has a written estimate been prepared of the annual cost of post-closure monitoring and maintenance of the facility (265.144a)?	___	___	_____
What is the amount of the post-closure cost estimate? $_____			
2. Is the annual estimate multiplied by 30 to cover the entire post-closure care period (265.144a)?	___	___	_____
3. Does the cost estimate cover all activities in the post-closure plan (265.144a)?	___	___	_____
4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.144b)?	___	___	_____
5. Was the adjustment made by using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.144b)?	___	___	_____

Latest Annual Deflator = _____

Previous Annual Deflator = _____

Inflation Factor = _____ (Latest Deflator/Previous Deflator)

Annual Cost Adjustment = $_____ (Latest Adjusted Estimate x Inflation Fact

Post-Closure Cost Estimate = $_____ (Annual Cost Adjustment x 30)

IX. Financial Requirements: - Continued
(Part 265 Subpart H)

	Yes	No	Comments
6. Was the cost estimate revised whenever a change in the post-closure plan increased the cost of post-closure (265.144c)? (Revised estimate must be adjusted for inflation.)	___	___	_____
7. Are the following kept at the facility during the operating life of the facility: (265.144d)			
a. Latest post-closure cost estimate?	___	___	_____
b. Latest adjusted post-closure cost estimate?	___	___	_____
8. Is there written documentation supporting the post-closure cost estimate?	___	___	_____
a. Workups for labor, material and equipment requirements?	___	___	_____
b. Contractor estimates and bids?	___	___	_____
c. Figures derived from cost estimating handbooks?	___	___	_____
d. Figures derived from operator experience?	___	___	_____
9. Does the estimate accurately reflect the cost of post-closure for similar types of facilities?	___	___	_____

X. Use And Management Of Containers: (Part 265 Subpart I)

	Yes	No	Comments
1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?	✓		
2. Are containers compatible with H.W. stored in them (265.172)?	✓		
3. Are containers stored closed (265.173a)?	✓		
4. Are containers managed to prevent rupture or leakage (265.173b)?	✓		
5. Are containers inspected weekly for leaks and deterioration (265.174)?	✓		
6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?			n/a
7. Are incompatible wastes stored in separate containers (265.177a)?			n/a
8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?			n/a
9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by suffecient distance or protected by means of a dike, berm, wall, or other device (265.177c)?			n/a
10. Are containers that are not empty managed as a H.W. (261.7a.2)?	✓		
11. For a container to be considered empty the facility must ensure that:			
a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)?			all empties handled as hazardous waste
b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents			

XI. Tanks:
(Part 265 Subpart J)

	Yes	No	Comments
1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	✓		
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	✓		
c. Damage the structural integrity of the tank?	✓		
2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?	✓		
3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?	✓		maintain 3 foot freeboard
4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?			n/a
5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			tanks are used for the same waste stream
a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?			n/a
b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?			n/a

XI. Tanks: - Continued
(Part 265 Subpart J)

	Yes	No	Comments
6. Are daily and weekly inspections done for the following:			
a. Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)?	N/A	✓	
b. Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)?			n/a
c. Level of waste in uncovered tanks (Daily) (265.194a.3)?		✓	
d. Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)?	✓		
e. Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)?	✓ → no confinement structures in yet will be completed when pond closure is finished		
7. At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)?	✓		
8. Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or			n/a
9. Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)?			n/a
10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)?			n/a
11. Are incompatible wastes stored in separate tanks (265.199a)?			n/a
12. Are H.W. not placed in unwashed tanks that previously held an incompatible (265.199b)?			n/a

XII. Surface Impoundments: (Part 265 Subpart K) are not in use, are going through closure

	Yes	No	Comments
1. Do impoundments have at least 2 feet of freeboard (265.222)?	___	___	na
2. Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity (265.223)?	___	___	
3. Does the facility conduct waste analysis and trial treatment tests, or have they obtained written documentation on similar treatment of similar waste under similar opreating conditions before the impoundment is is used to:			
a. Chemically treat a H.W. which is substantially different from waste previously treated in the impoundment (265.225a.1)?	___	___	
b. Chemically treat H.W. with a substantially different process than was previously used (265.225a.2)?	___	___	
4. Is the treatment of H.W. in impoundments conducted so that it does not: (265.225a.2)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	___	___	
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	___	___	
c. Damage the structural integrity of the liner?	___	___	
d. Threaten human health or the environment?	___	___	
5. Is the freeboard level inspected at least daily (265.226a.1)?	___	___	
6. Are the dikes inspected weekly for evidence of leaks, deterioration or failure (265.226a.2)?	___	___	

XII. Surface Impoundments: - Continued
(Part 265 Subpart K)

	Yes	No	Comments
7. At closure, has the facility removed from the impoundments: (265.228a)			
a. Standing liquids?	✓		
b. Waste and waste residues?	✓		
c. The liner, if any?			no liner
d. Underlying and surrounding contaminated soil?	✓		
8. At closure, has the facility demonstrated under § 261.3 c & d that none of the materials listed in (7) remaining at any stage of removal are H.W. (265.228b)?		✓	high levels of total organic carbon have been found. issue is still to be resolved
9. If the answers to (7) & (8) are no, has the facility closed the impoundment and provided post-closure care as a landfill (265.228c)?			
10. Is an ignitable or reactive waste treated, or mixed before or immediately after placement in an impoundment so that the resulting waste no longer meets the definition of ignitability or reactivity (265.229a.1)?			n/a
11. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same impoundment (265.230)?			n/a

Dennis Corp.

CAD 008 300 455

Addendum to CDB Data

Check

7. Does the facility have:

1 up & 3 downgradient wells? not satisfactory upgradient well ✓

A system capable of detecting leaks? ✓

First monitoring samples in the lab? Pb contamination ✓

---

8. Does a waiver demonstration exist? No

Has the waiver been challenged by EPA or the state? N/A

---

9. Any evidence of a leak to groundwater (even without adequate statistical verification) detected by the detection monitoring system? (must be a system - not just random well placement) yes

---

10. Has facility made good faith efforts to comply with any applicable enforcement actions? yes

O'Brien

Addendum to CDB Data

	Check
7. Does the facility have:	
1 up & 3 downgradient wells?	Yes
A system capable of detecting leaks?	Yes
First monitoring samples in the lab?	Yes
8. Does a waiver demonstration exist?	No
Has the waiver been challenged by EPA or the state?	
9. Any evidence of a leak to groundwater (even without adequate statistical verification) detected by the detection monitoring system? (must be a system - not just random well placement)	?
10. Has facility made good faith efforts to comply with any applicable enforcement actions?	Yes

O'Brien

Addendum to CDB Data

	Check
7. Does the facility have:	
1 up & 3 downgradient wells?	Yes
A system capable of detecting leaks?	Yes
First monitoring samples in the lab?	Yes
8. Does a waiver demonstration exist?	No
Has the waiver been challenged by EPA or the state?	
9. Any evidence of a leak to groundwater (even without adequate statistical verification) detected by the detection monitoring system? (must be a system - not just random well placement)	?
10. Has facility made good faith efforts to comply with any applicable enforcement actions?	Yes

O'Brien

Addendum to CDB Data

	Check
7. Does the facility have:	
1 up & 3 downgradient wells?	Yes
A system capable of detecting leaks?	Yes
First monitoring samples in the lab?	Yes
8. Does a waiver demonstration exist?	No
Has the waiver been challenged by EPA or the state?	
9. Any evidence of a leak to groundwater (even without adequate statistical verification) detected by the detection monitoring system? (must be a system - not just random well placement)	?
10. Has facility made good faith efforts to comply with any applicable enforcement actions?	Yes

STATE OF CALIFORNIA
DEPARTMENT OF HEALTH SERVICES

01 JUL 1986

TOXIC SUBSTANCES
CONTROL DIVISION

HAZARDOUS WASTE

INSPECTION REPORT

DATE of INSPECTION 5-29-86

FIRM NAME O'Brien Corporation

SITE CLASSIFICATION RCRA [X] Non RCRA [ ]

ADDRESS 450 East Grand Avenue

Major [X] Non Major [ ]

South San Francisco, CA 94080

EPA I.D. No. CAD 005130455

(WMS)/WME Patti Barni

Date of Submittal June 4, 1985

Purpose
Interim Status Document Inspection

Background
The previous ISD inspection was conducted on June 25, 1985 with a Notice of Violation issued on November 12, 1985. An EPA oversight inspection was conducted on December 18, 1985. This inspection produced a second Notice of Violation which dealt with violations observed during the December inspection and carry-over violations not adequately corrected in submittals generated from the November, 1985 Notice.

Persons Present
Don Mazzone - O'Brien Corporation
Mike Burdine - O'Brien Corporation
Patti Barni - DOHS/TSCD

Facility Description
See previous report.

Wastes generated

a. spent solvents: Approximately 5,000 gallons per month of spent solvents are picked up by Romic Company. O'Brien places "dirty" solvents in paint tanks for cleaning. The solvents are pumped from paint tank to paint tank until the solvent no longer effectively cleans the tanks. At that point the solvent is declared a waste and Romic is called.

b. powdered wastes: Approximately 2 drums of powdered wastes are generated per year. Mr. Burdine stated the wastes are usually discontinued pigments.

c. wastewater treatment sludge: Latex washwater is pumped by pipeline to the 10,000 gallon treatment tank and then to the 20,000 gallon treatment tank for polymer and alum treatment. The effluent is discharged to the sanitary sewer and the sludge is pumped to drums for disposal.

6.13.86

The O'Brien Corporation is exploring alternatives to the treatment and disposal of the latex washwater. A paint is being developed which will be made of sludge from the latex washwater. Effluent will be incorporated into other paint manufacturing.

Observations

a. drum storage: The O'Brien Corporation has re-organized the drum storage. Wastes are separated by types and empty containers. All drums had labels. O'Brien had 2 labels in use. Most drums had the standard acceptable hazardous waste labels with all required information. A smaller group of drums had another label which read "hazardous waste" and had the O'Brien Corp. waste identification number and an accumulation date recorded on it. Mr. Burdine stated the acceptable hazardous waste label with all required information is placed on the drum prior to shipping. Mr. Burdine was told this practice is unacceptable. All drums must be labeled with the appropriate hazardous waste label containing all the required information. He stated the labels would be attached today. (See photos 1, 2 and 3)

b. treatment tanks: NFPA labels were noted on the treatment tanks. (See photo 4) Mr. Burdine stated a 3 foot freeboard is maintained on the tanks. Liquids flow into the tanks during the dayshift only. The foreman closes all valves to the tanks at the end of her shift.

c. solvent storage tanks: Not inspected since no one specific tank has been designated for storage. Since the solvents are used for tank cleaning which ever tank receives the solvent last is declared storage once the solvent no longer is effective.

d. pond cleanup: Closure activities have been temporarily halted until the O'Brien Corporation defines the high levels of total organic carbon found on-site.

The O'Brien Corporation during the months of October and November performed additional soil excavation of small areas in the east pond. The contaminated soil containing high levels of lead were contained in 55-gallon drums. Due to weather conditions, flooding, and water-logged soils, the O'Brien Corporation has been unable to move these drums to the drum storage area. The facility failed to label the contaminated soil-filled drums with the appropriate hazardous waste labels. (See photo 5) Mr. Burdine stated the drums would be labeled and due to the soil conditions they could now probably be moved to storage.

Alleged Violations

1. ISD Section I, Part 3: The O'Brien Corporation has failed to submit an operation plan for the Hazardous Waste Facility Permit as requested in the correspondence dated October 29, 1985. (California Administrative Code, Section 66388(a)1)

2. ISD Section III, Part 3(b)1,2,3: The O'Brien Corporation Waste Analysis Plan does not identify parameters for analyses, test methods used, and sampling methods for routinely generated wastes. (CAC, Section 67102(b)1,2,3)

3. ISD Section VIII, Part 3(a) 1 and 3: The O'Brien Corporation has failed to maintain logs of daily inspections of discharge control equipment and freeboard of hazardous waste storage and treatment tanks. (CAC, Section 67259(a) 1 and 3)

4. ISD Section VIII, Part 3(a): The O'Brien Corporation has failed to inspect and maintain inspection logs for spent solvent waste tanks. (CAC, Section 67259 a)

5. ISD Section II, Part 2(d): The O'Brien Corporation has failed to identify tanks used to store spent solvents with National Fire Prevention Association (NFPA) placards.

6. ISD Section IV, Part 3(d): The O'Brien Corporation has failed to file an Annual Report for 1985 describing all treatment activities conducted on-site. (CAC, Section 67105 e)

7. ISD Section II, Part 4(c) 1-5: The O'Brien Corporation has failed to properly label hazardous waste drums filled with contaminated soils generated during the surface impoundment cleanup/closure. (CAC, Section 66508(c))

Discussion

Violations 1 through 3 were discussed with management. Drums within the storage area will be re-labeled correctly and those drums currently in the pond area will be given labels. Mr. Burdine stated they will attempt to move the drums to the storage area on 5-30-86. Previous attempts have been unsuccessful due to moist soils.

Samples Collected

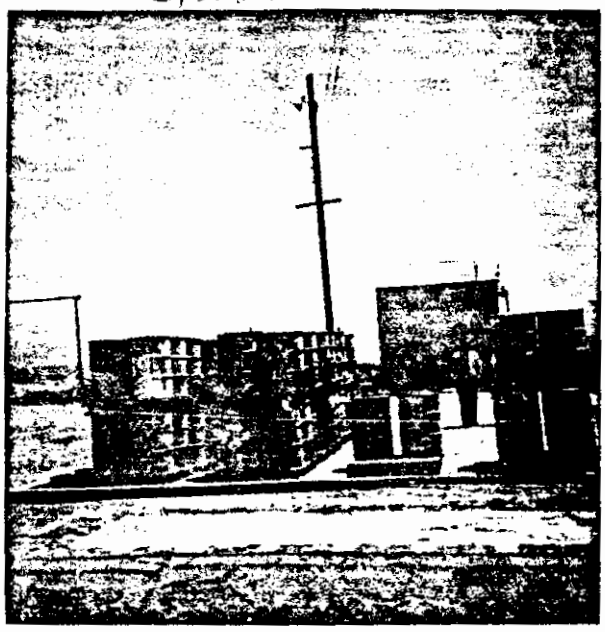
None

Attachments

generator checklist
CAMEL
EPA checklist
Draft Remedial Action Order
Major Facility Status Sheet
Photographs

The O'Brien Corporation
May 29, 1986

5/29/86

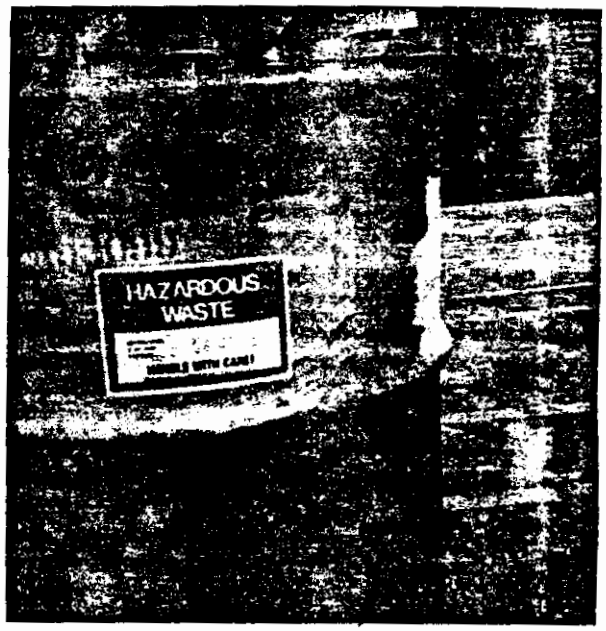


O'Brien Corp:

Photo 1

Photo 1: Overview of the O'Brien drum storage area

5/29/86

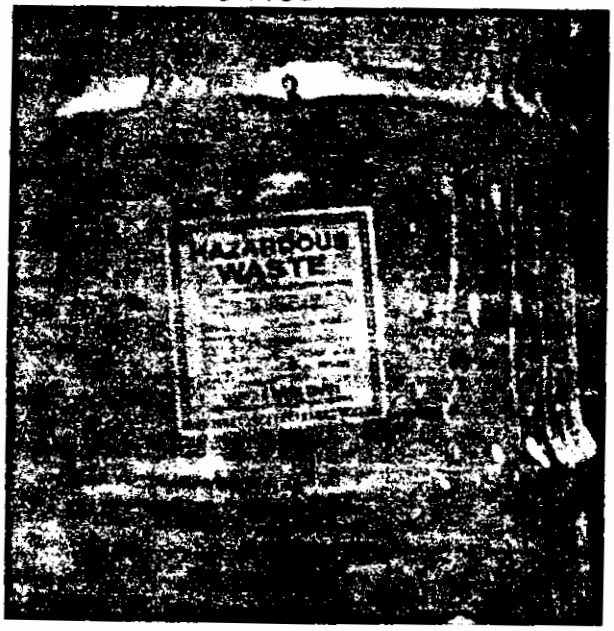


O'Brien Corp.

Photo 2

photo 2: unsufficient labeling information on drum within storage area

5/29/86



O'Brien Corp:

Photo 3

photo 3: Label on drum stored within the drum storage area.

The O'Brien Corporation
May 29, 1986

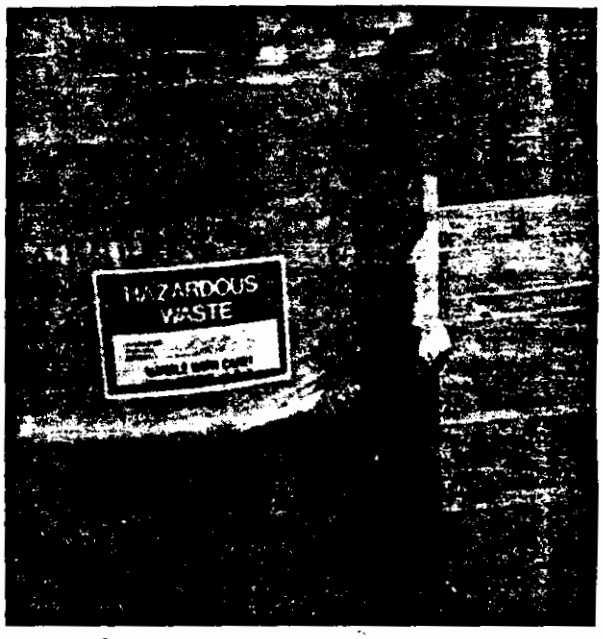
5/29/86

O'Brien Corp:

Photo 1

Photo 1: Overview of the O'Brien drum storage area

5/29/86



OBrien Corp.

Photo 2

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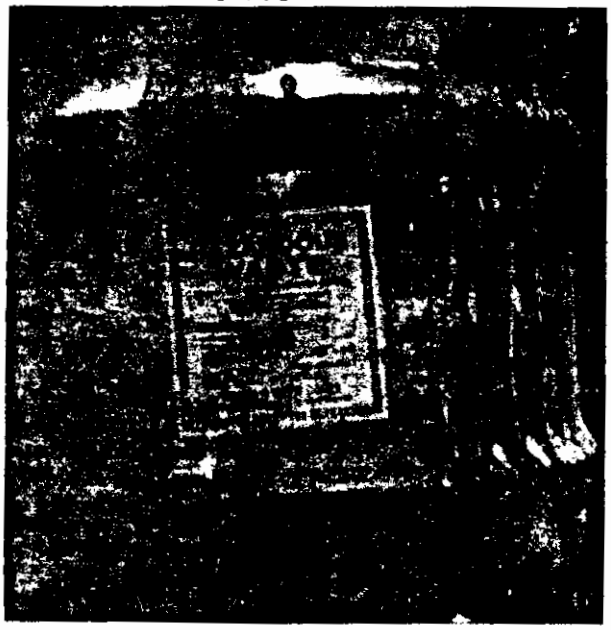
5/29/86



O'Brien Corp:

photo 3: Label on drum stored within the drum storage area.